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*Attorneys for Defendant,
Uber Technologies, Inc.*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

ANTHONY SCOTT LEVANDOWSKI,

Debtor.

ANTHONY SCOTT LEVANDOWSKI, an
individual,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.

Defendant.

Case No. 20-30242 (HLB)

Chapter 11

Adv. Pro. No. 20-03050 (HLB)

**DECLARATION OF KATHARINE
MCLAUGHLIN IN SUPPORT OF UBER
TECHNOLOGIES INC.'S
(1) MOTION IN LIMINE REGARDING
ARBITRATION AWARD AND (2)
MOTION IN LIMINE BARRING
ALLEGED EVIDENCE AND
ARGUMENT ABOUT UBER'S
ALLEGED MOTIVATIONS AND
INTENT TO HARM GOOGLE**

1 I, Katharine McLaughlin, hereby declare as follows:

2 1. I am co-counsel to Defendant Uber Technologies, Inc. (“Uber”) in the above-entitled
3 action and have personal knowledge of the facts contained in this Declaration, which are true and
4 correct, and if sworn as a witness, I could and would testify competently thereto.

5 2. I submit this declaration in support of (1) Uber’s *Motion in Limine Regarding*
6 *Arbitration Award* and (2) Uber’s *Motion in Limine Barring Alleged Evidence and Argument About*
7 *Uber’s Alleged Motivations and Intent to Harm Google* (together, “**Motions in Limine**”). In
8 connection with the Motions in Limine, Uber has also filed an *Administrative Motion To File Partially*
9 *Redacted Motions in Limine and to File Exhibits Under Seal* (“Motion to Seal”)

10 3. Attached hereto as **Exhibit 1** is a true and correct copy of the corrected final award
11 from the matter of *Google LLC v. Levandowski and Ron*, Case Ref. No. 1100086069 (JAMS Dec. 23,
12 2019) (“Google Arbitration”). Exhibit 1 has been provisionally redacted pursuant to the Motion to
13 Seal.

14 4. Attached hereto as **Exhibit 2** is a true and correct copy of Google LLC’s Response to
15 Respondents’ Motion for Offset, submitted in the Google Arbitration. Exhibit 2 has been provisionally
16 redacted pursuant to the Motion to Seal.

17 5. Attached hereto as **Exhibit 3** is a true and correct copy of an excerpt from the deposition
18 of Anthony Levandowski, taken in the above-captioned proceeding on January 28, 2021. Exhibit 3
19 has been provisionally redacted pursuant to the Motion to Seal.

20 6. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the May 3,
21 2018 testimony of Ognen Stojanovski at the final hearing in the Google Arbitration. Exhibit 4 has been
22 provisionally redacted pursuant to the Motion to Seal.

23 7. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the May 8,
24 2018 testimony of John Hartog at the final hearing in the Google Arbitration. Exhibit 5 has been
25 provisionally redacted pursuant to the Motion to Seal.

26 8. Uber has complied in good faith with the meet and confer requirements of Paragraph
27 11 of the Trial Scheduling Order at Dkt. 376.
28

1 I declare under the penalty of perjury that the statements included in this Declaration are true
2 and correct. Executed on this 31st day of January 2022 in Chicago, Illinois.

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4 /s/ Katharine McLaughlin
Katharine McLaughlin
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EXHIBIT 1 – REDACTED

**JAMS ARBITRATION
CASE REFERENCE NO 1100086069**

GOOGLE, LLC,

Claimant

and

ANTHONY SCOTT LEVANDOWSKI

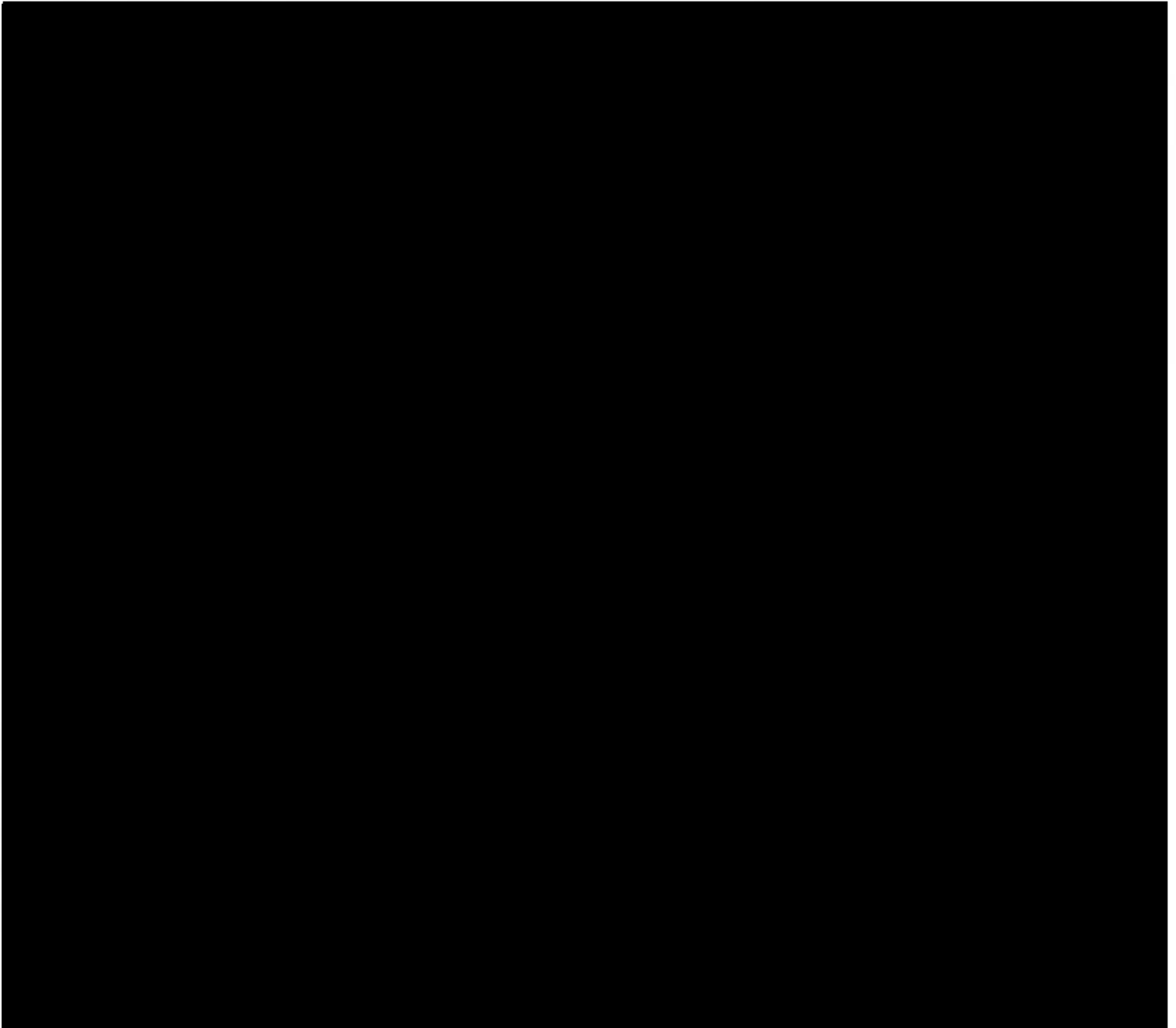
CORRECTED FINAL AWARD

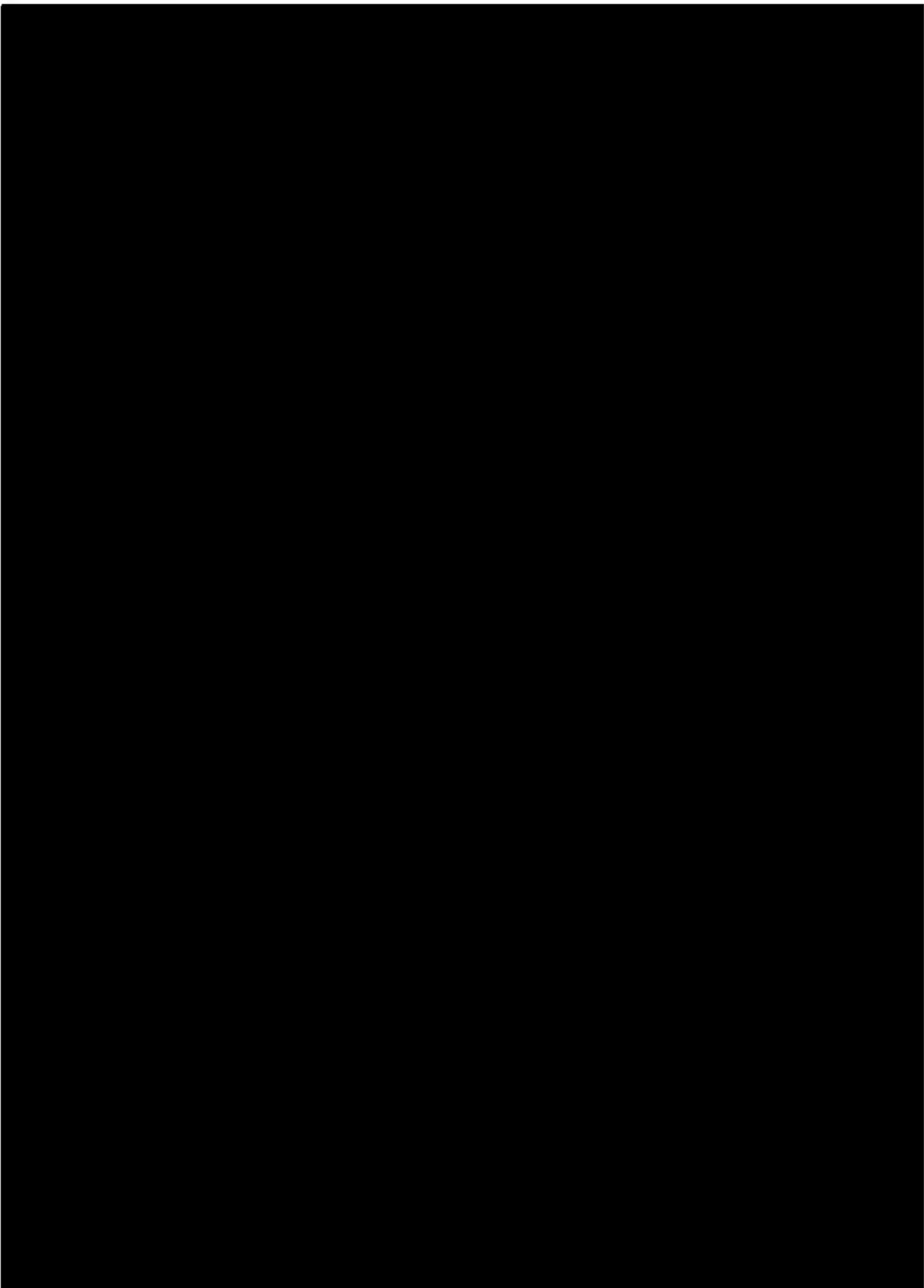
And

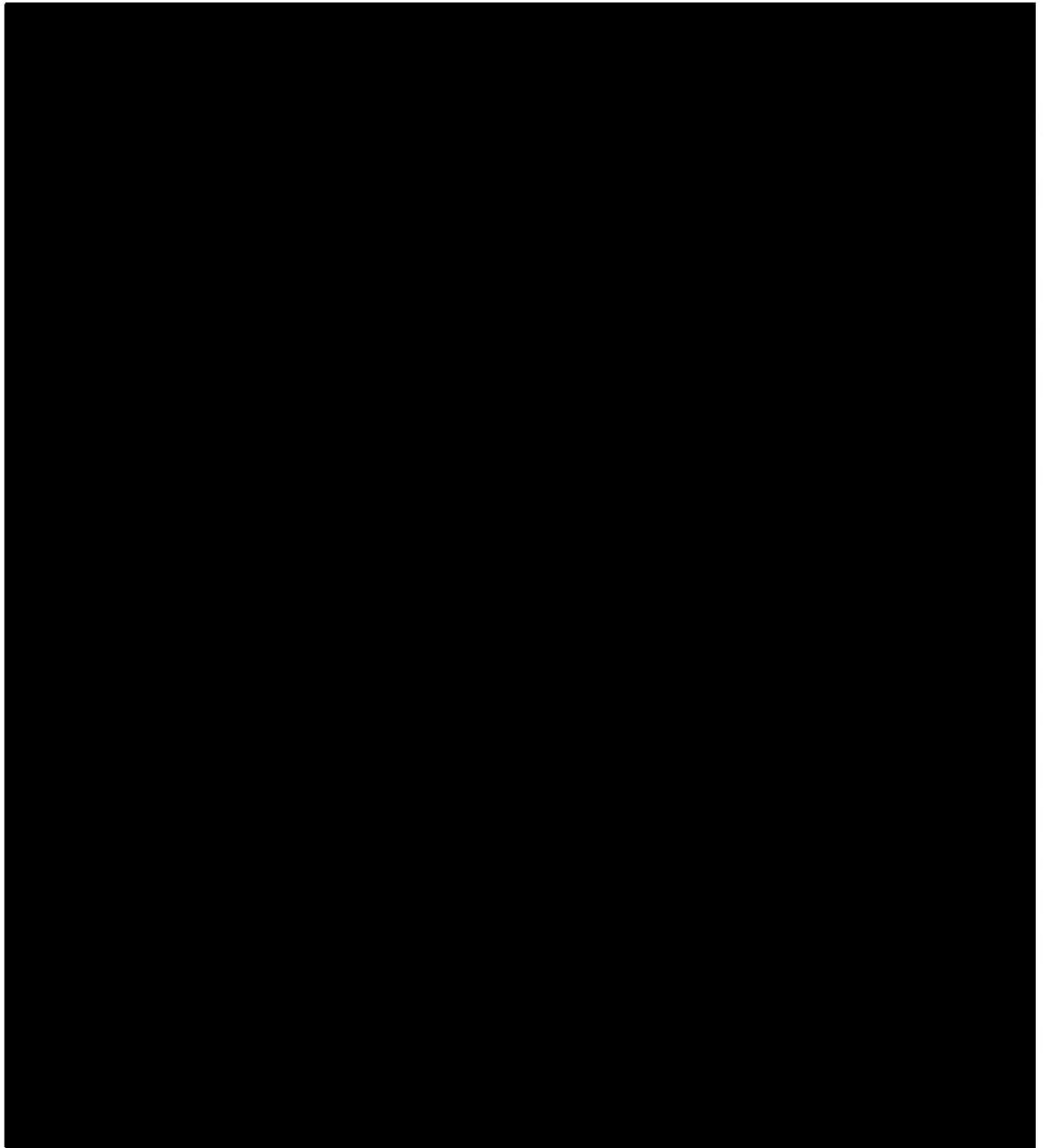
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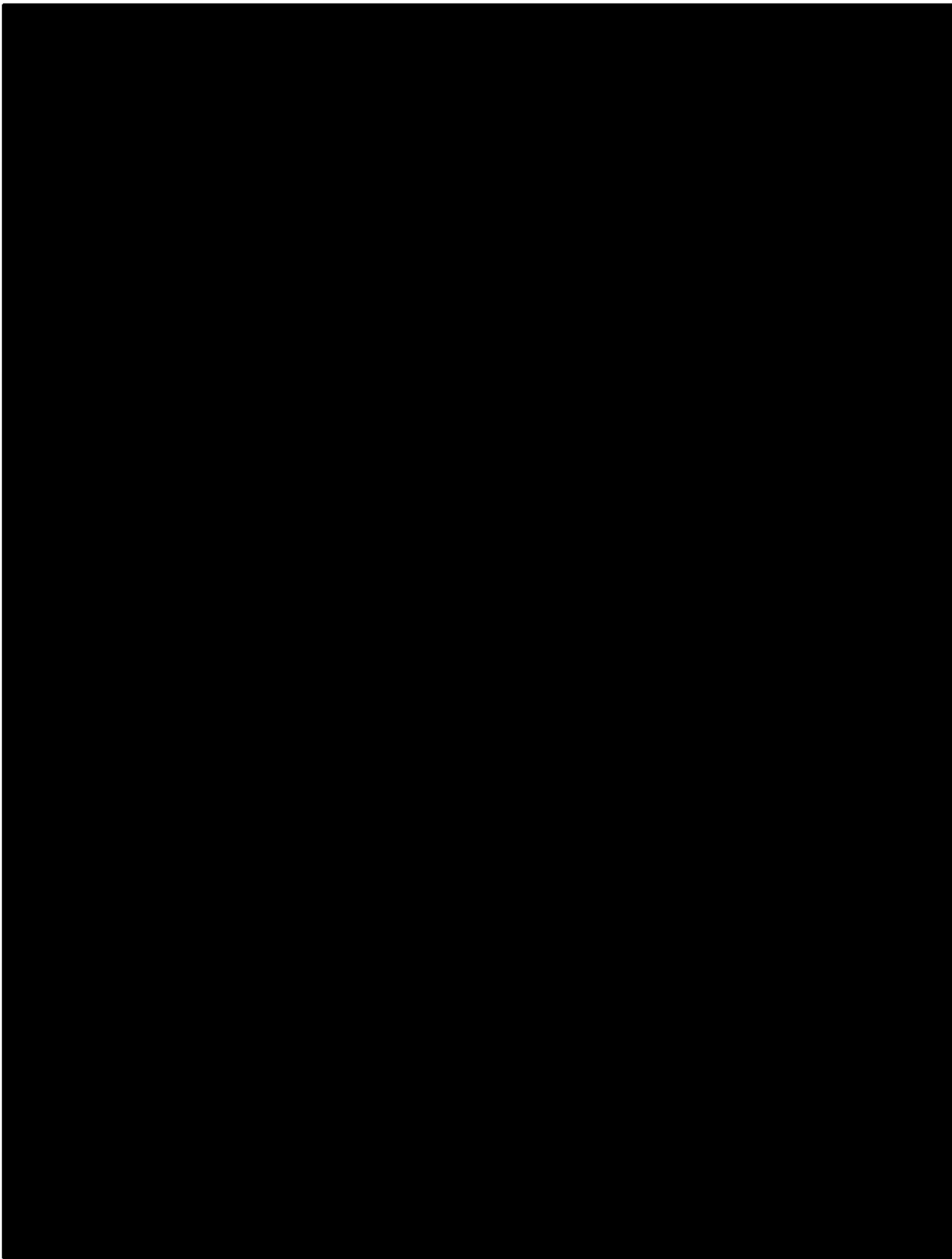
Respondents

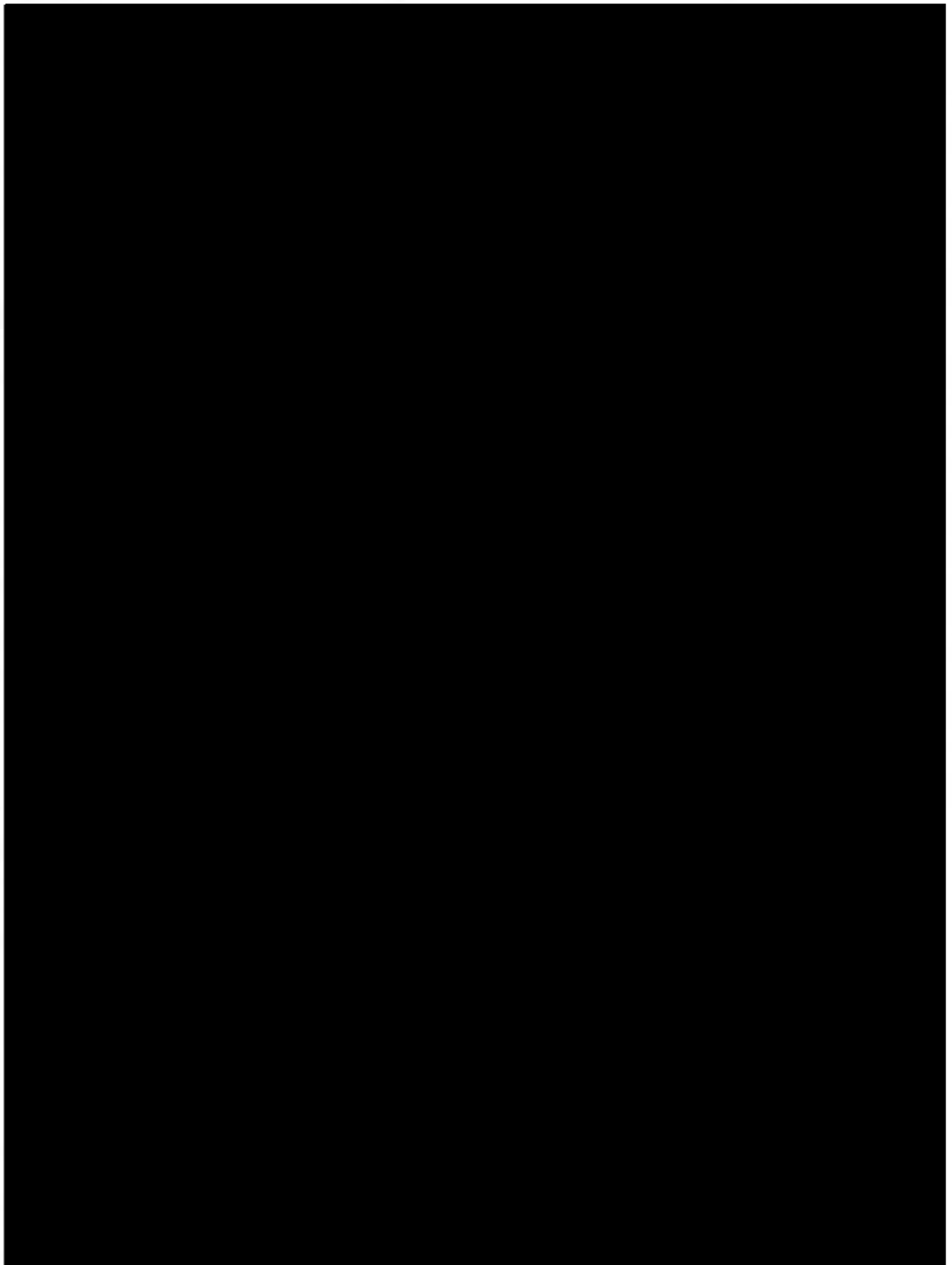
Counsel for Claimant	Counsel for Respondents
<p>Keker & Van Nest LLP 633 Battery Street San Francisco, CA 94111</p> <p>Robert A. Van Nest Rachael E. Meny Jennifer A. Huber Thomas R. Gorman W. Hamilton Jordan Jo W. Golub Ben Berkowitz Reid Mullen Molly Caldwell Villagra</p>	<p><i>Attorneys for Respondent Anthony Levandowski</i></p> <p>Goodwin Procter LLP 135 Commonwealth Drive Menlo Park, CA 94025</p> <p>Neel Chatterjee Brett M. Schuman Rachel M. Walsh Andrew Ong</p> <p><i>Attorneys for Respondent Lior Ron</i></p> <p>Taylor & Patchen LLP One Ferry Building, Suite 355 San Francisco, CA 94111</p> <p>Stephen E. Taylor Jonathan A. Patchen Cheryl A. Cauley Karan S. Dhadialla Daniel P. Martin</p>

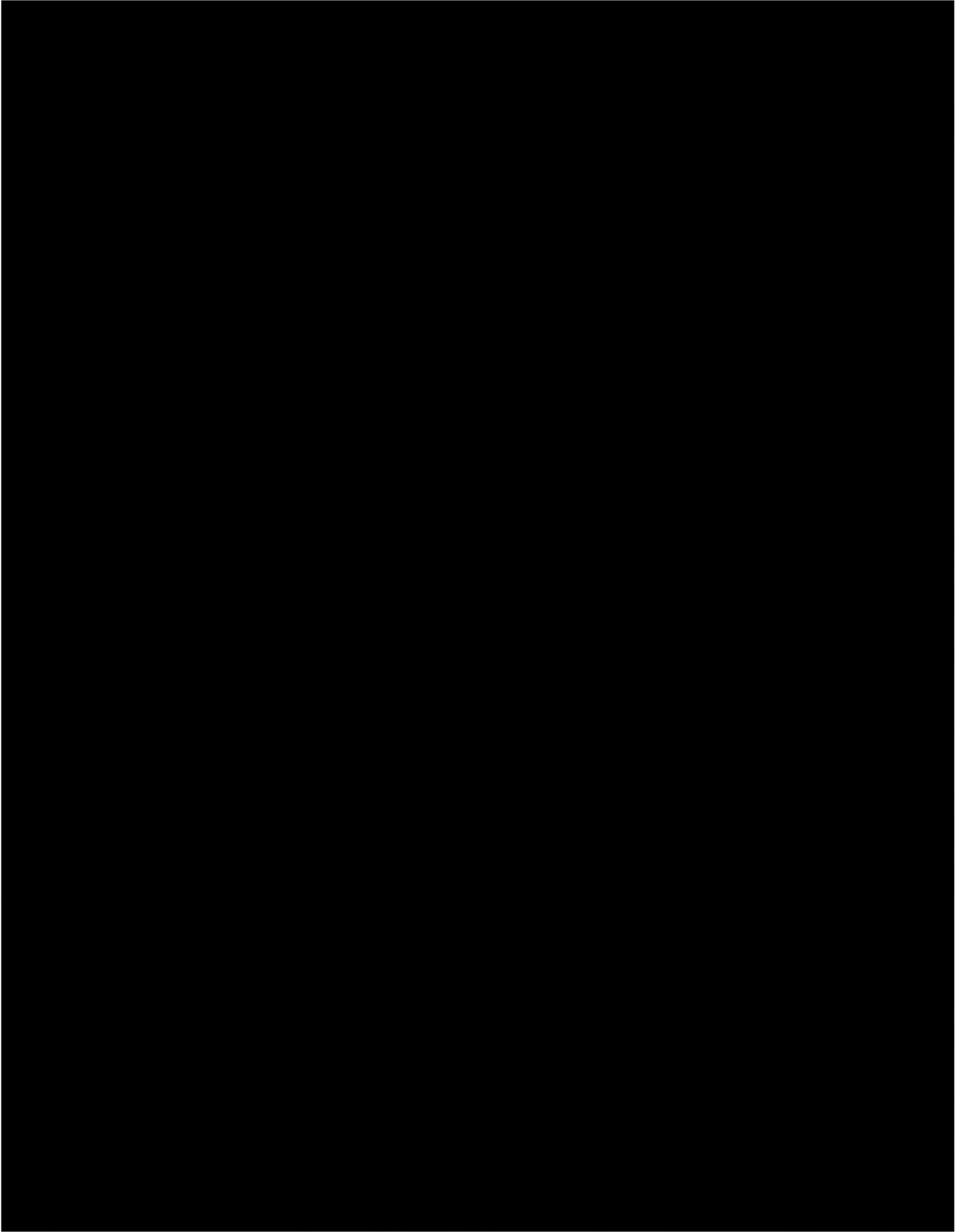


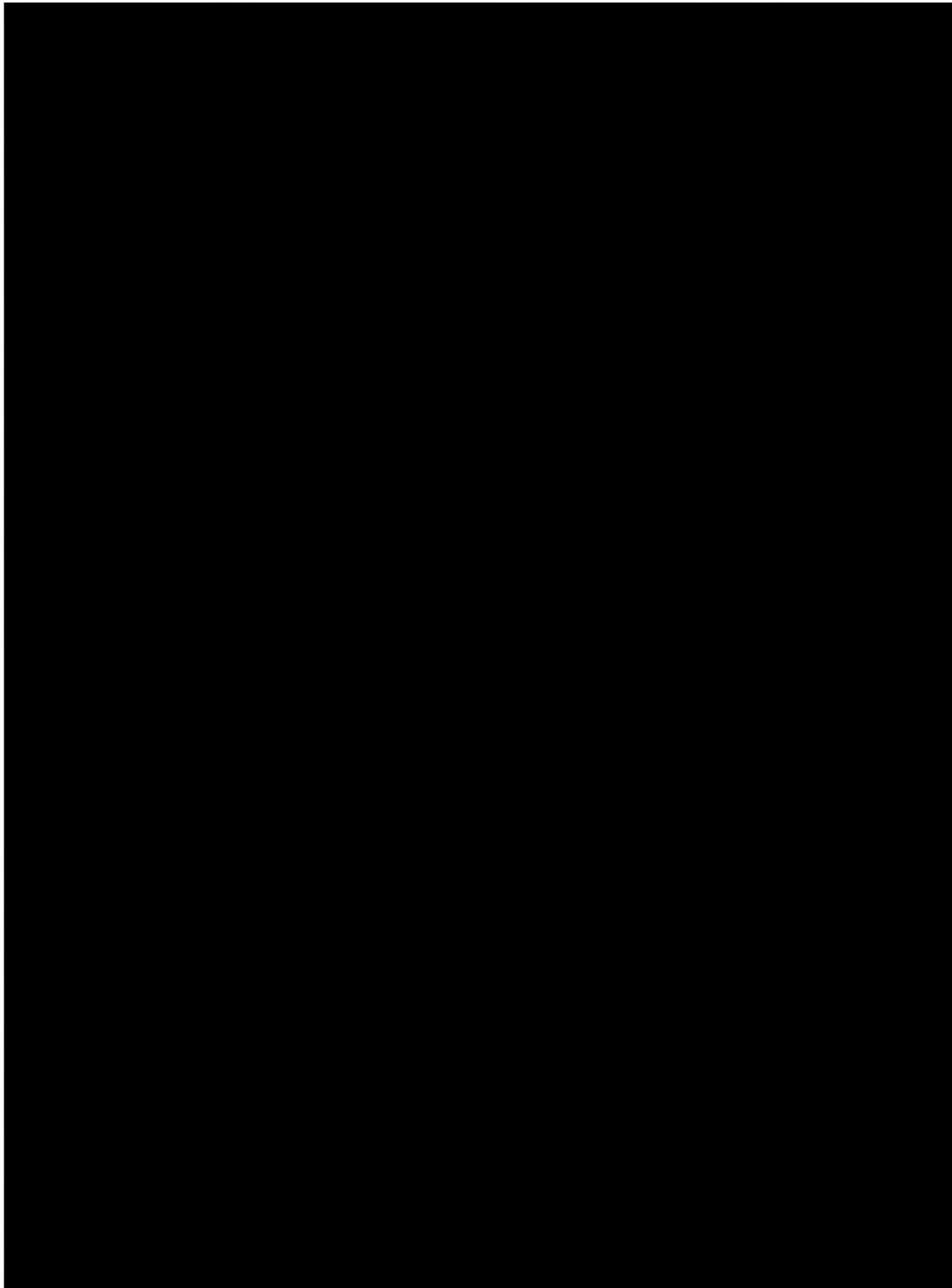


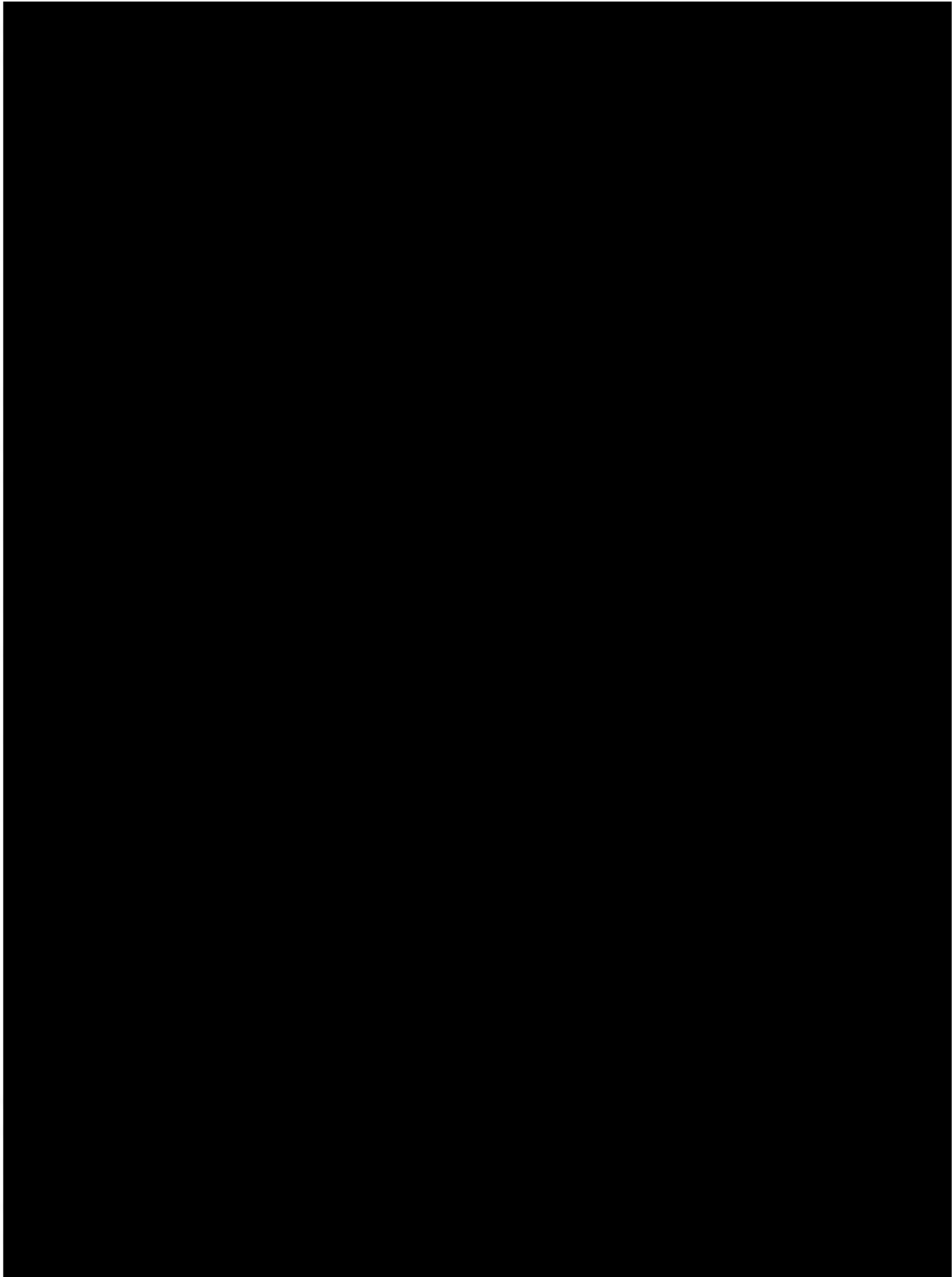


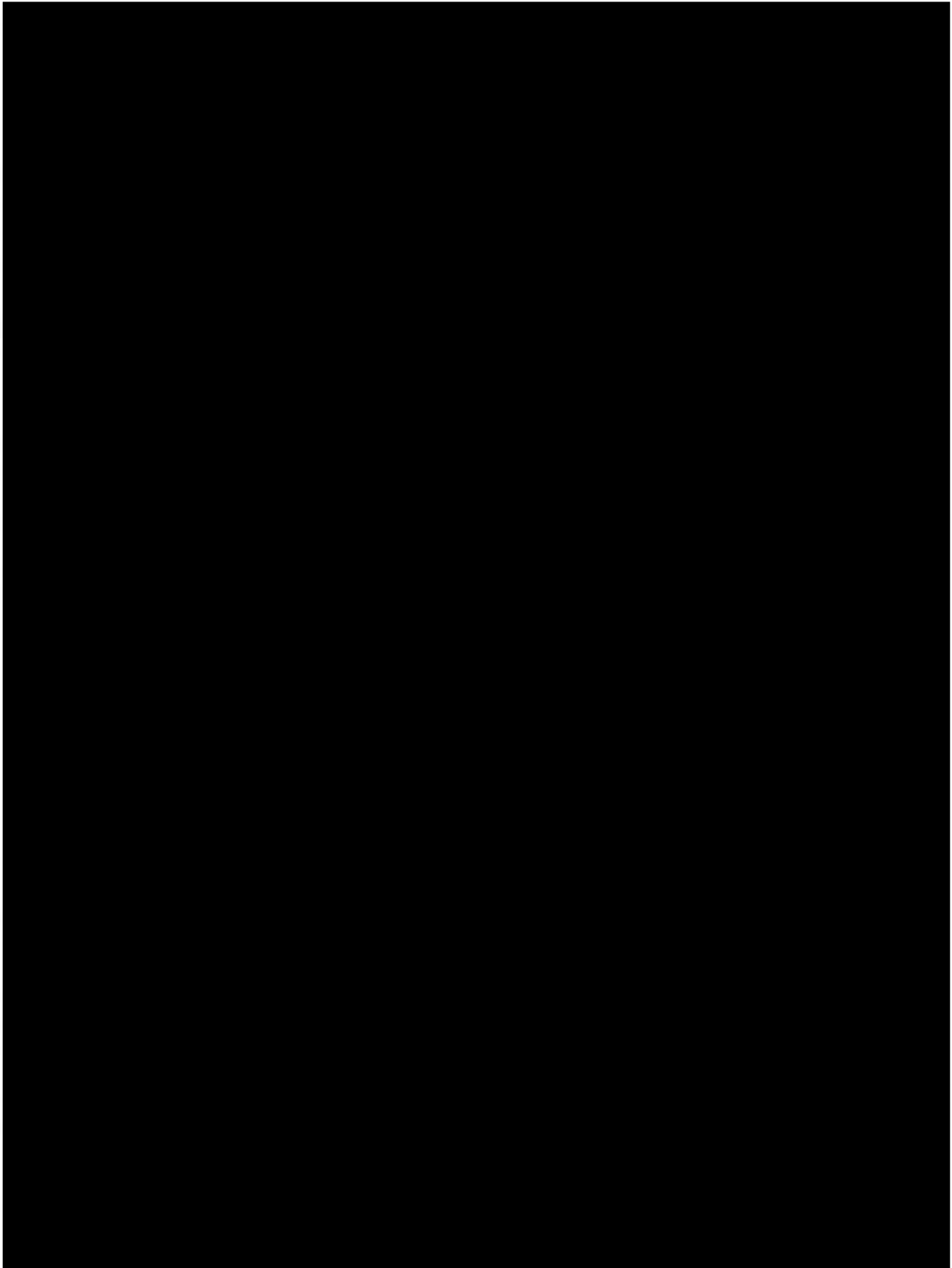


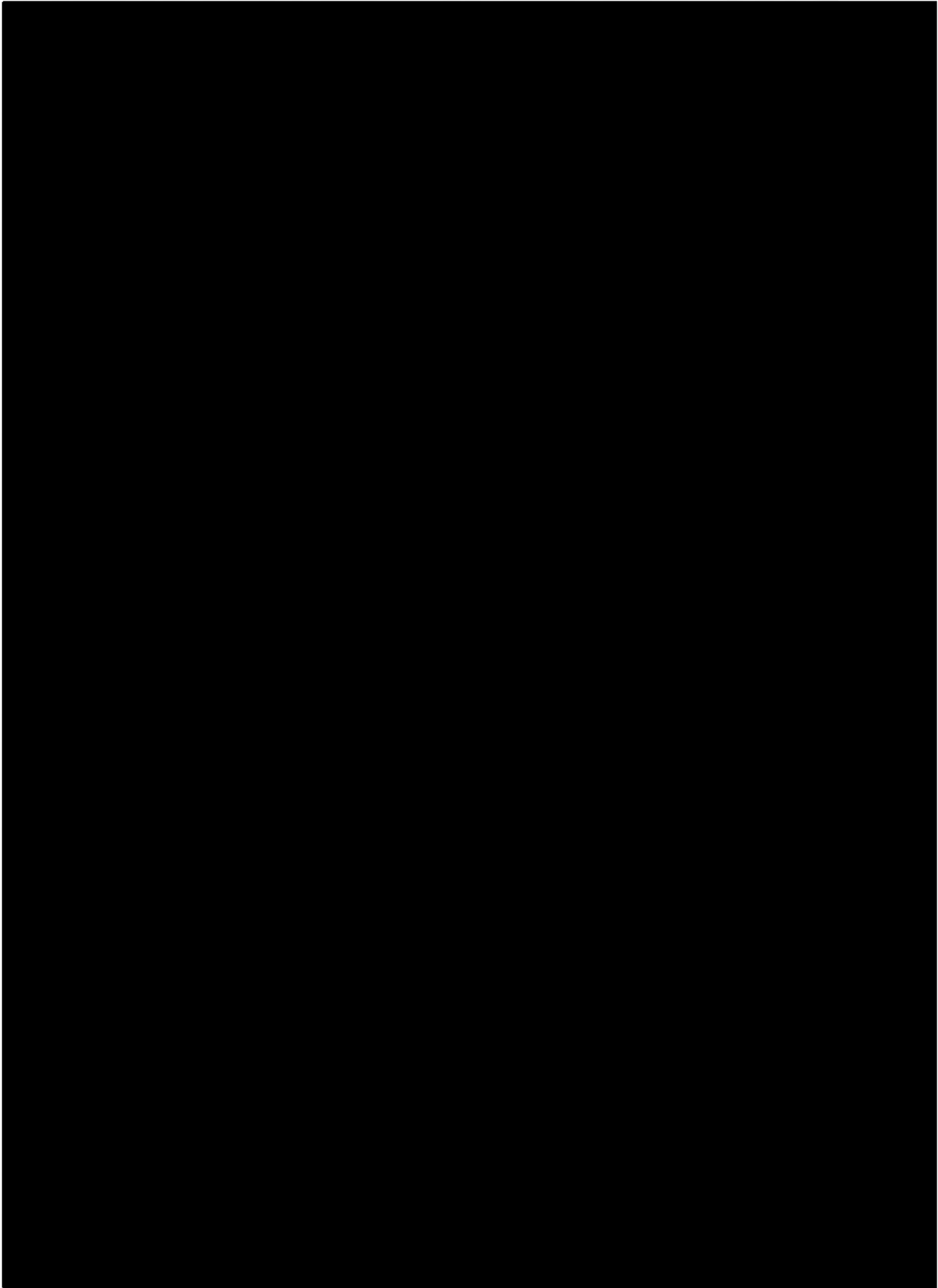


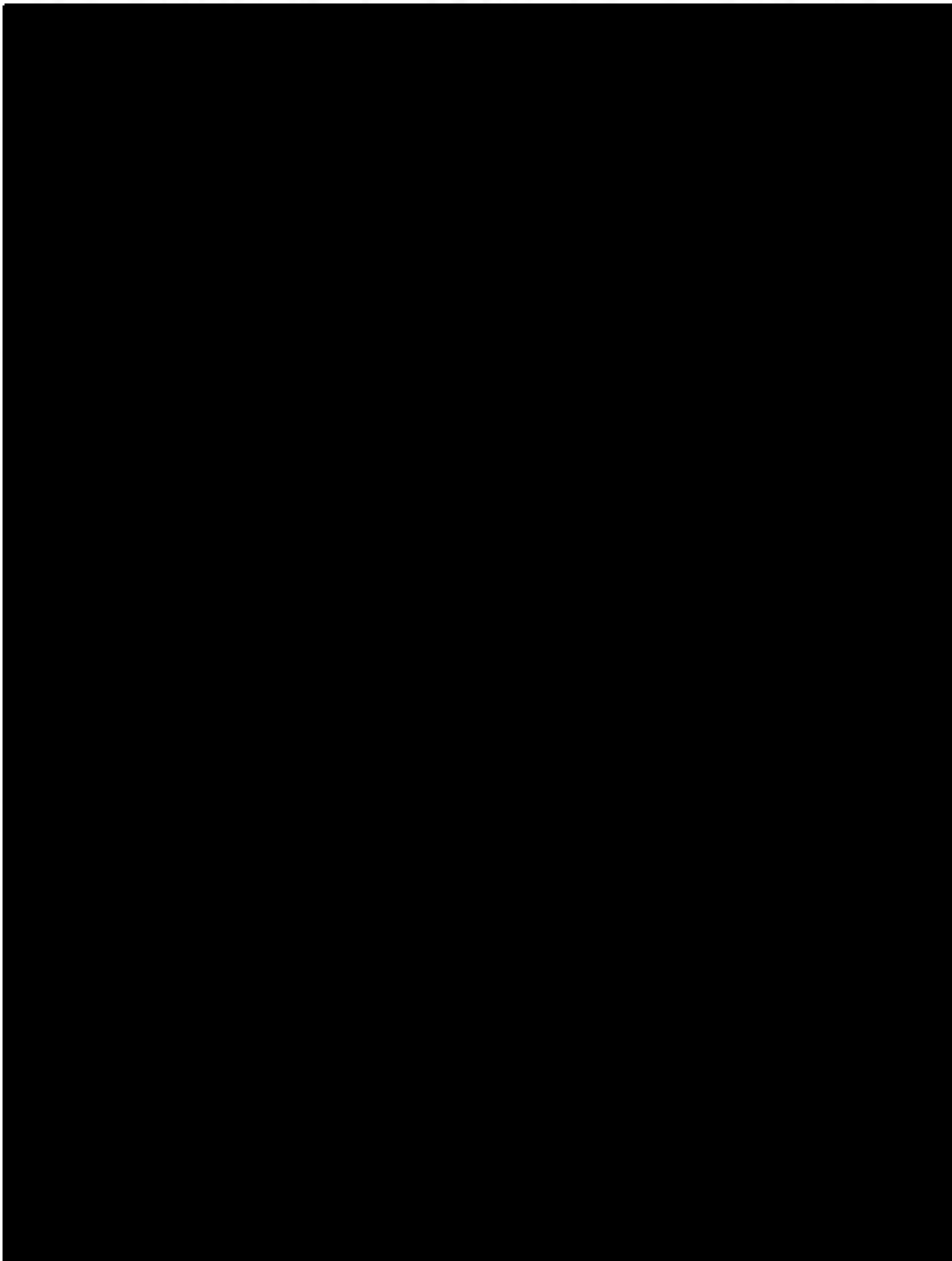


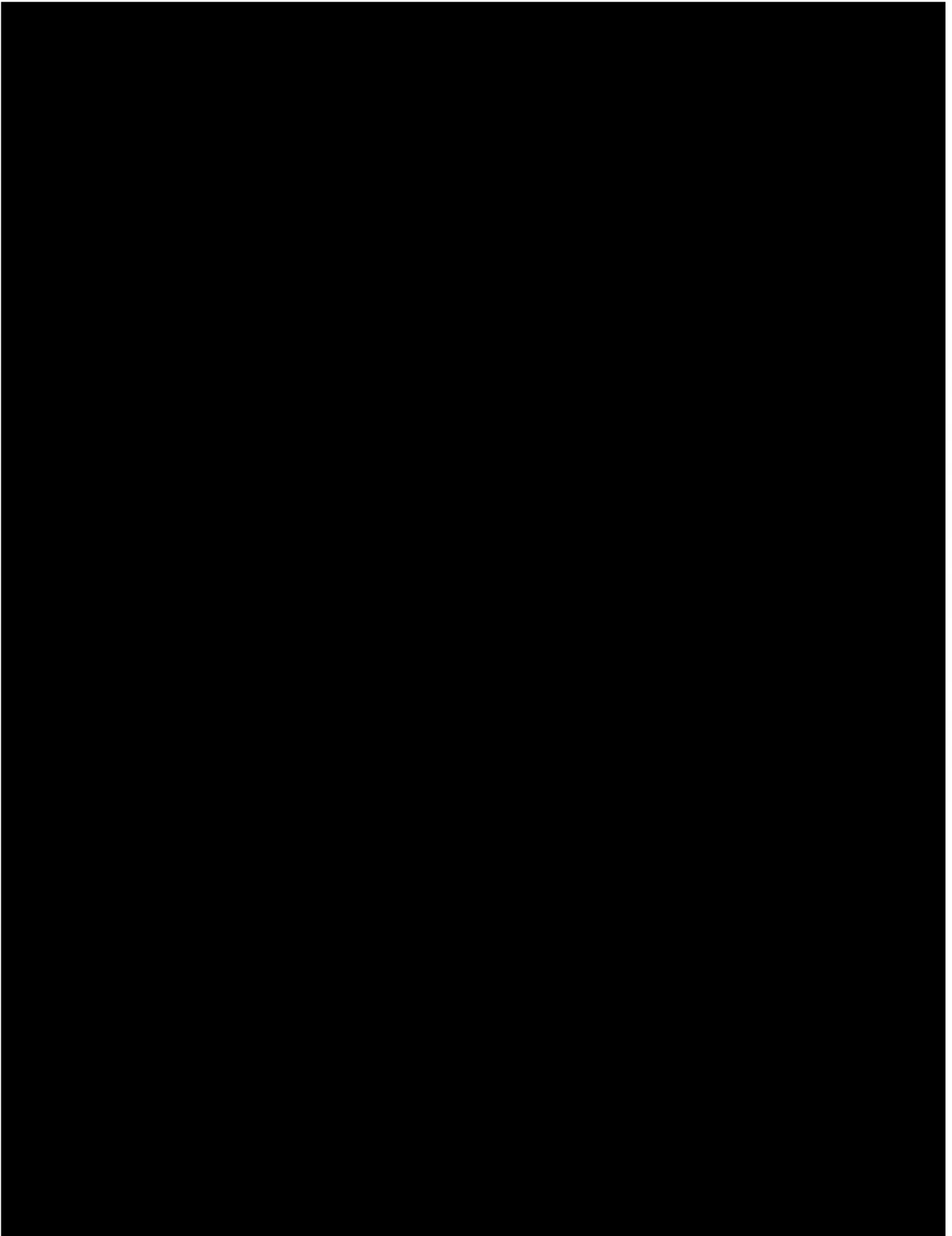


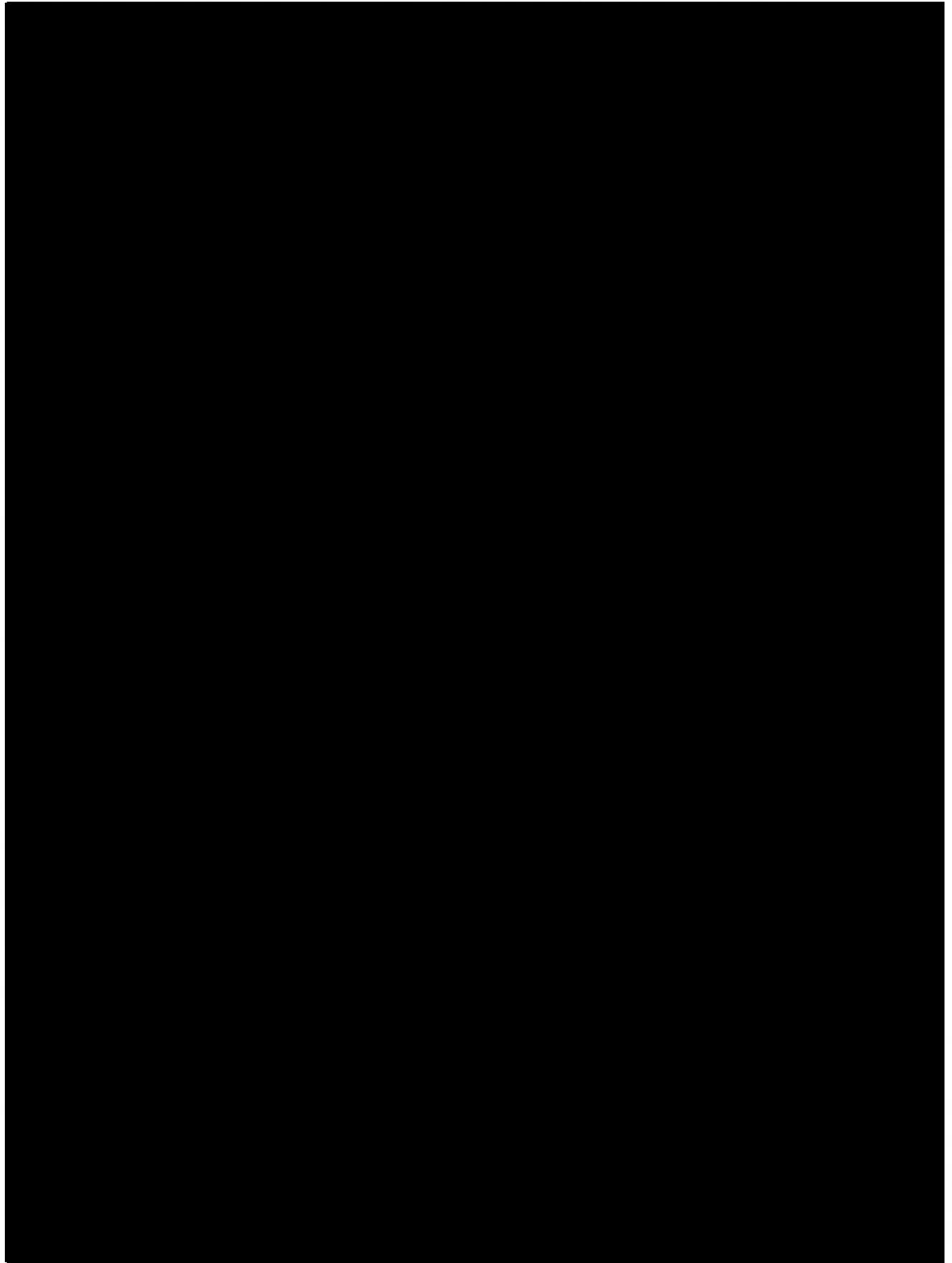


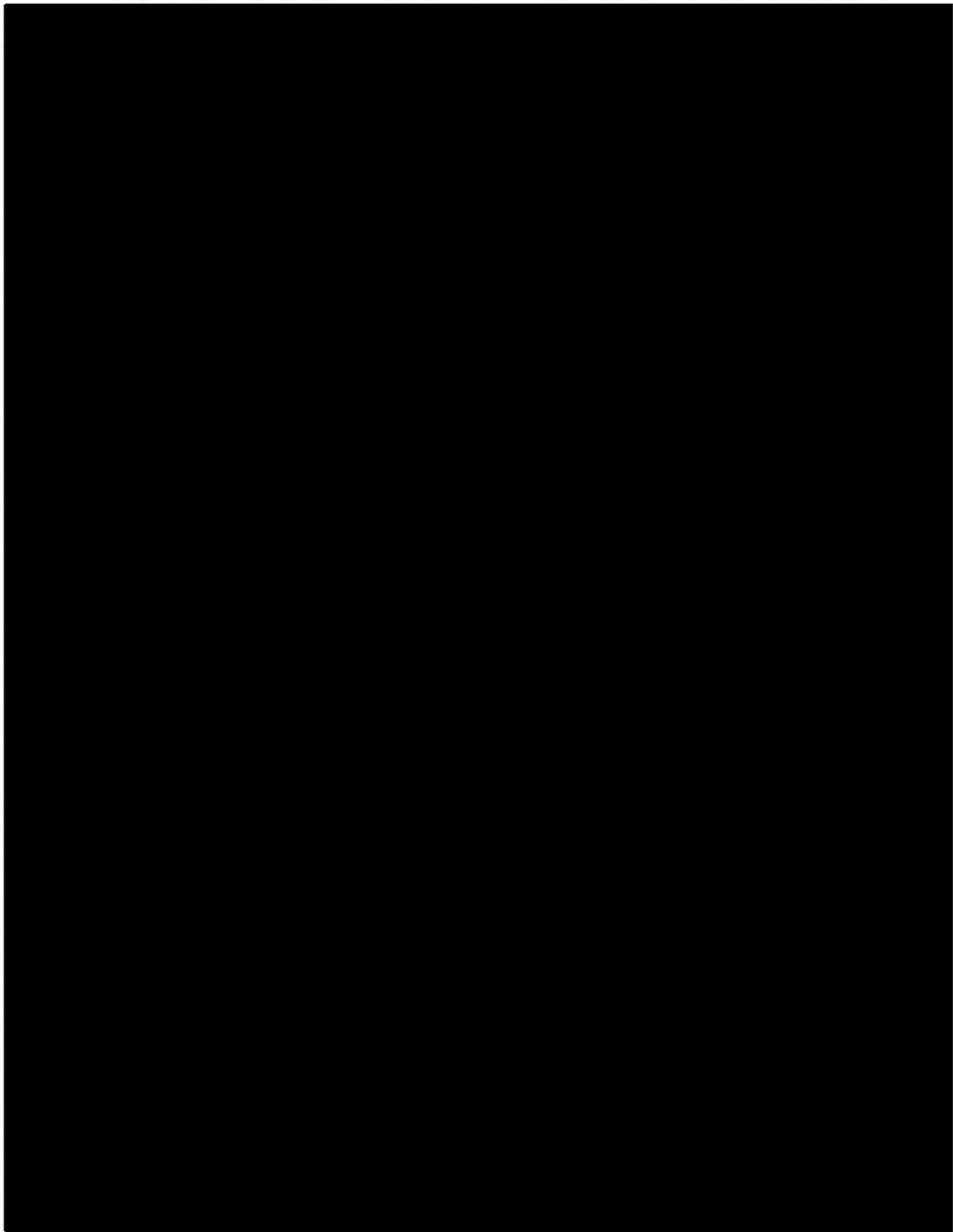


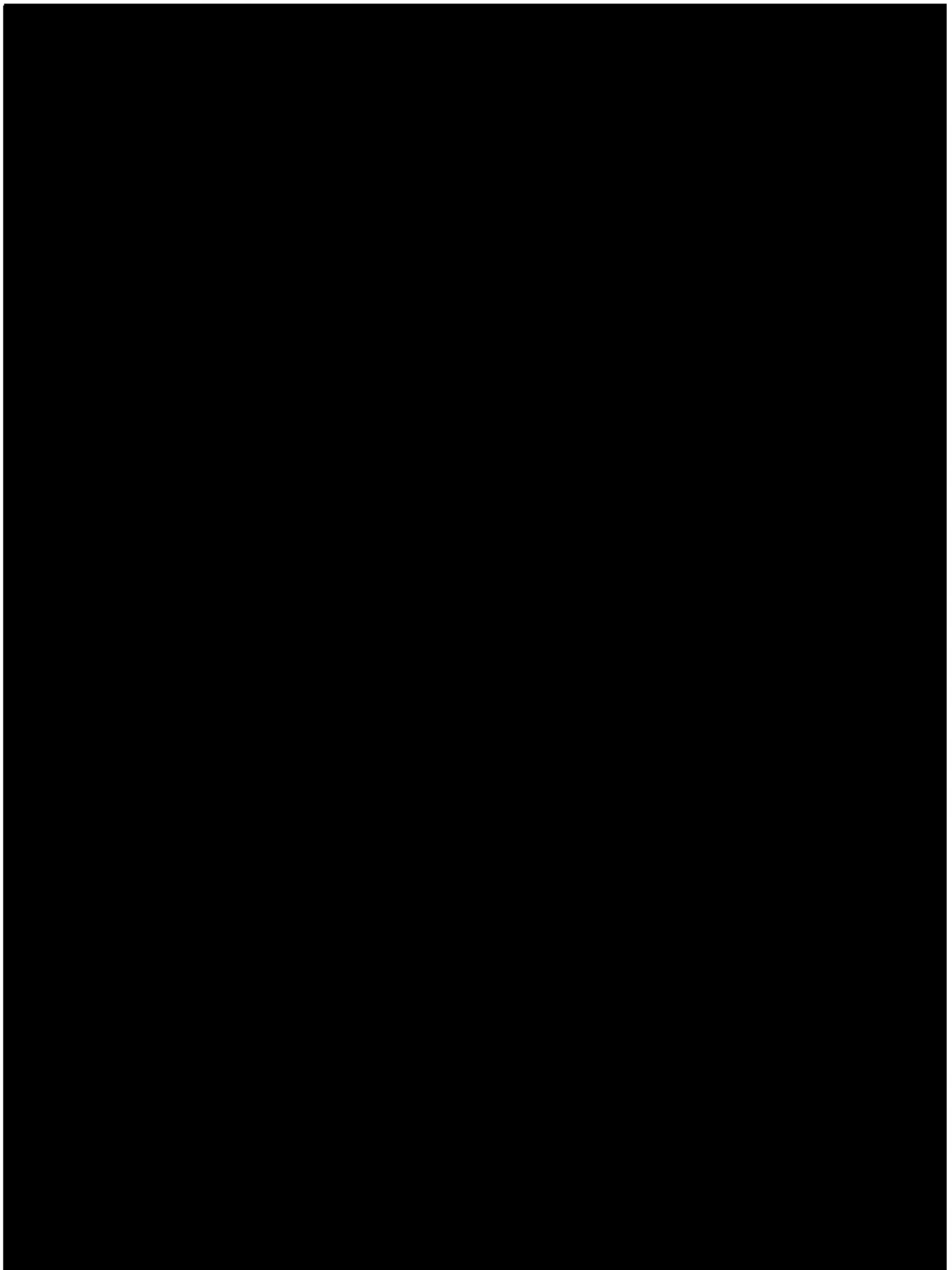


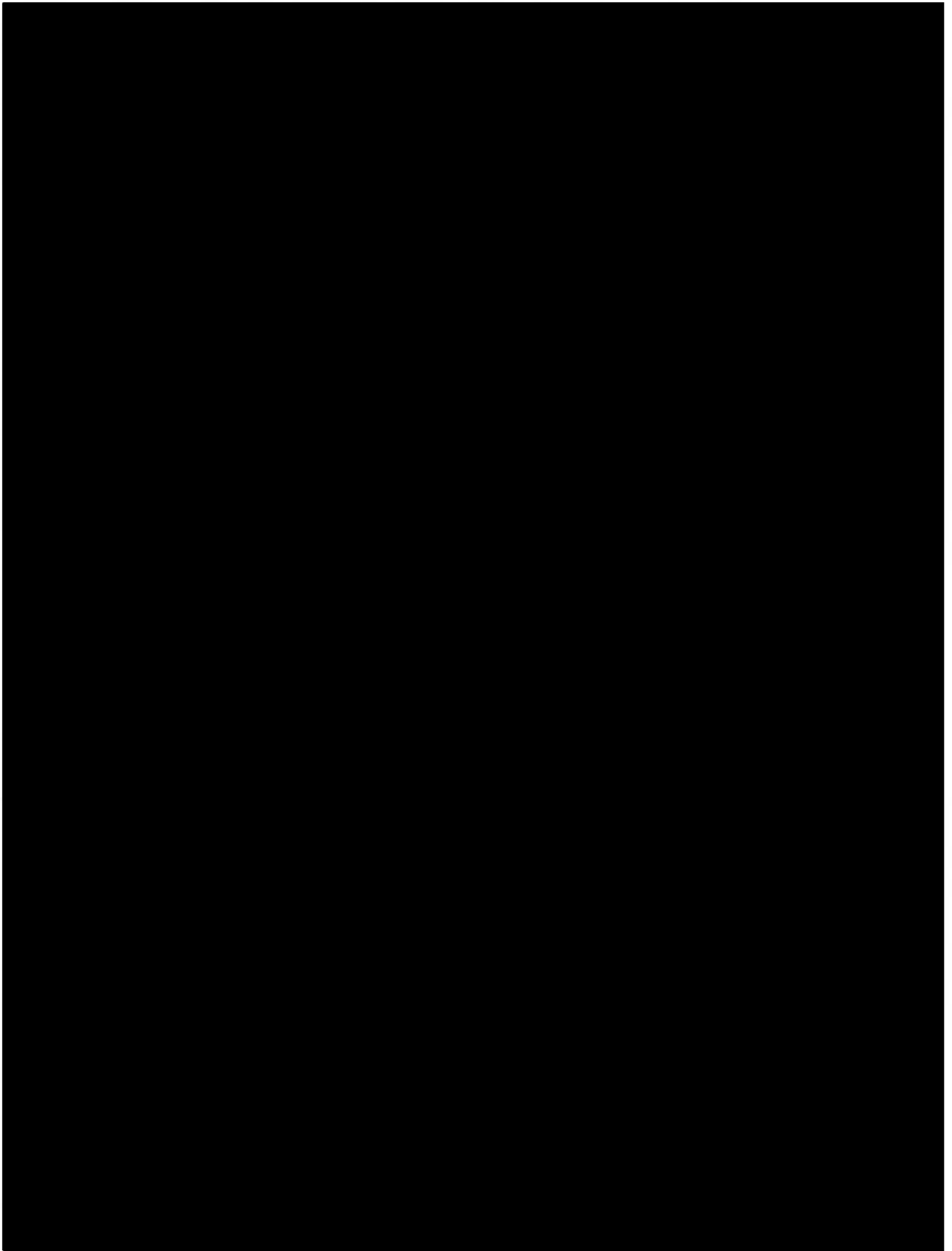


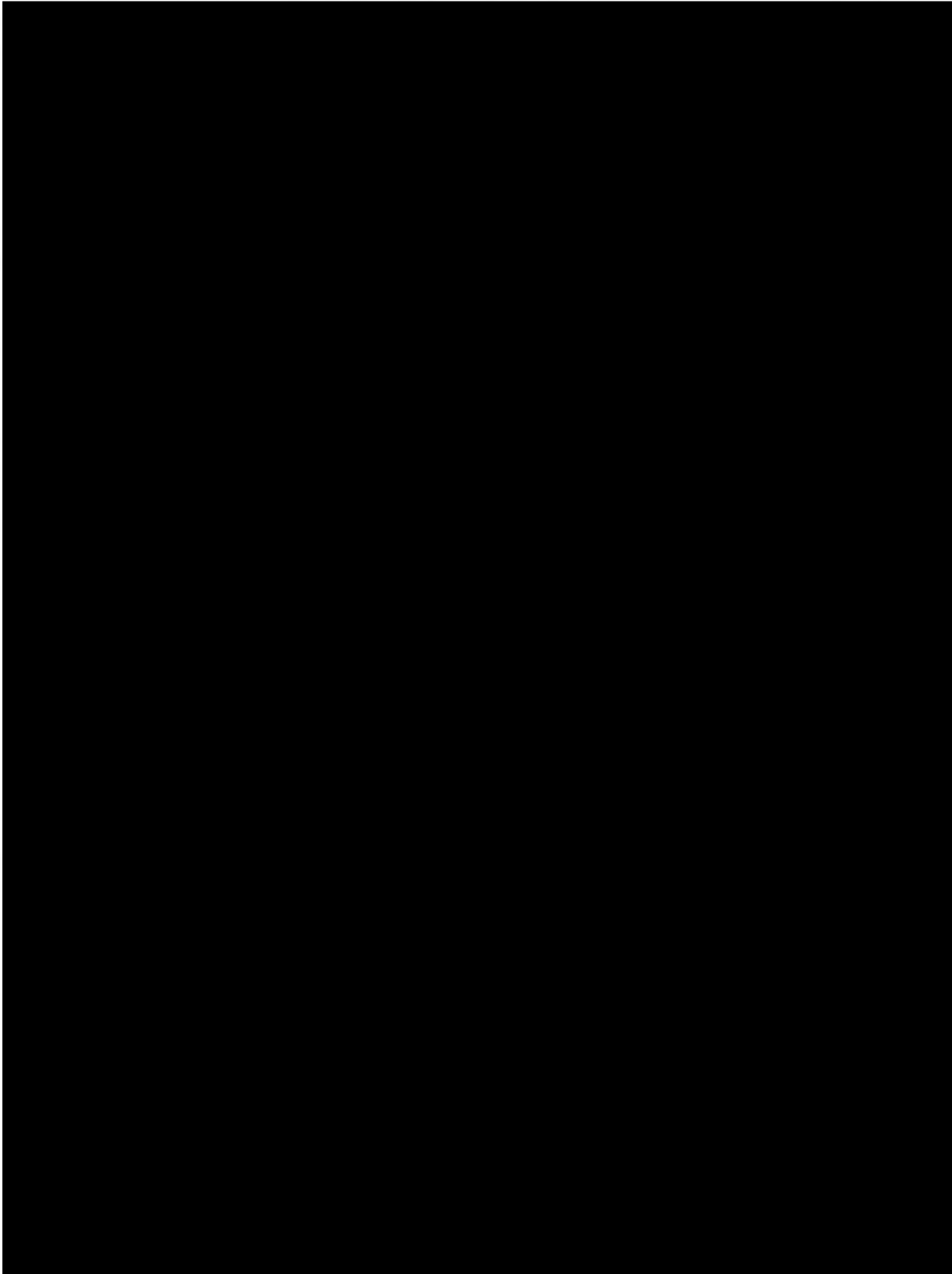


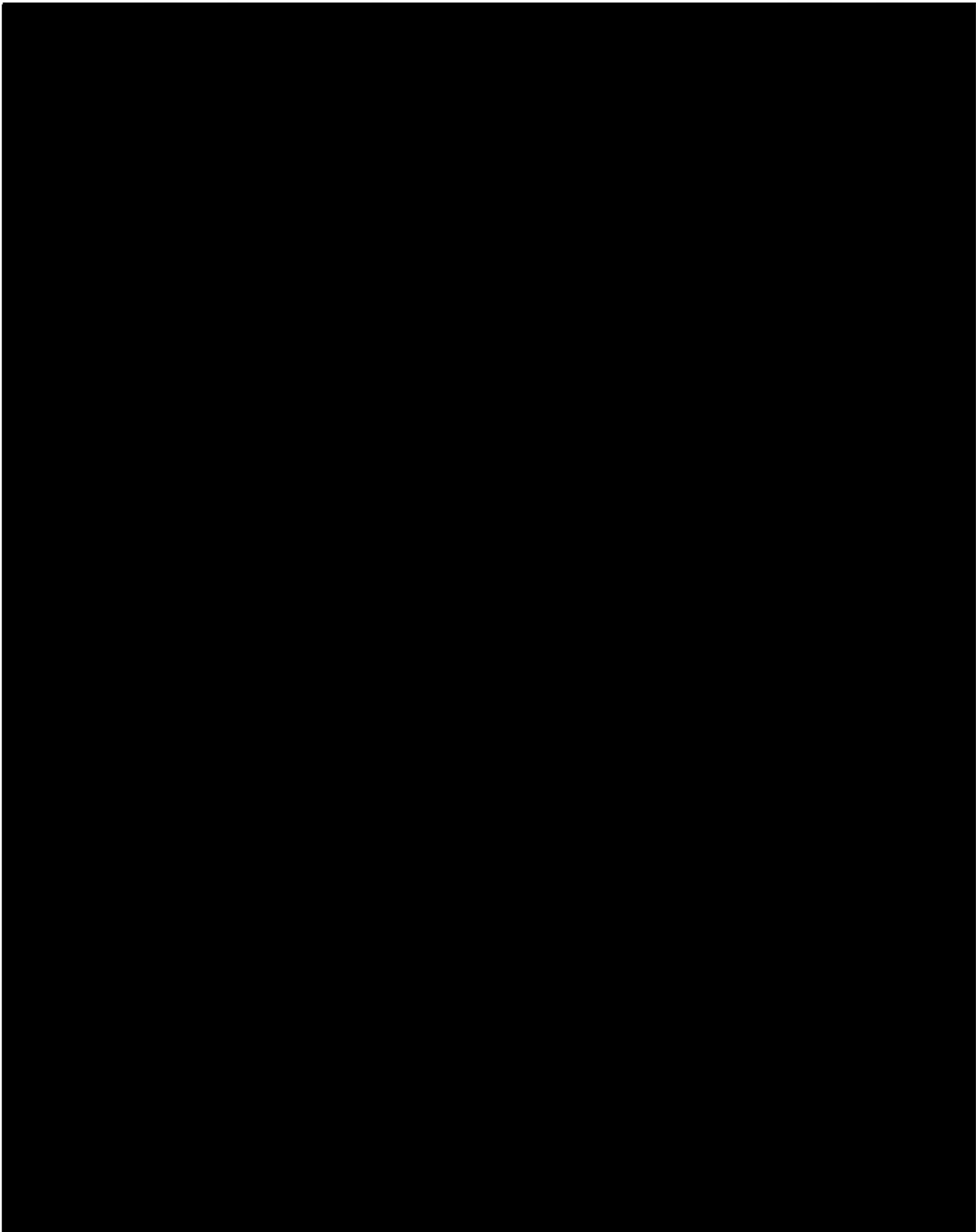


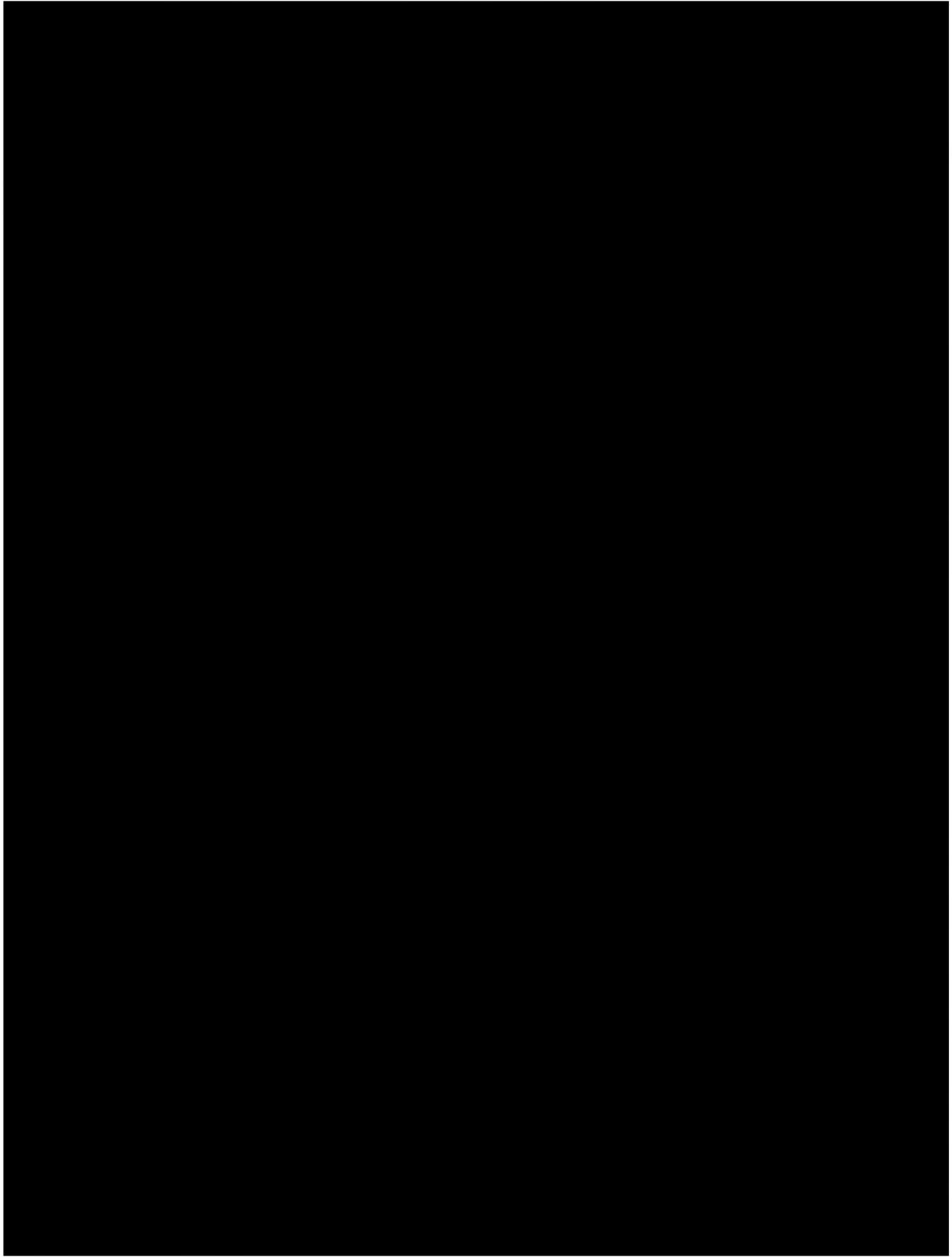


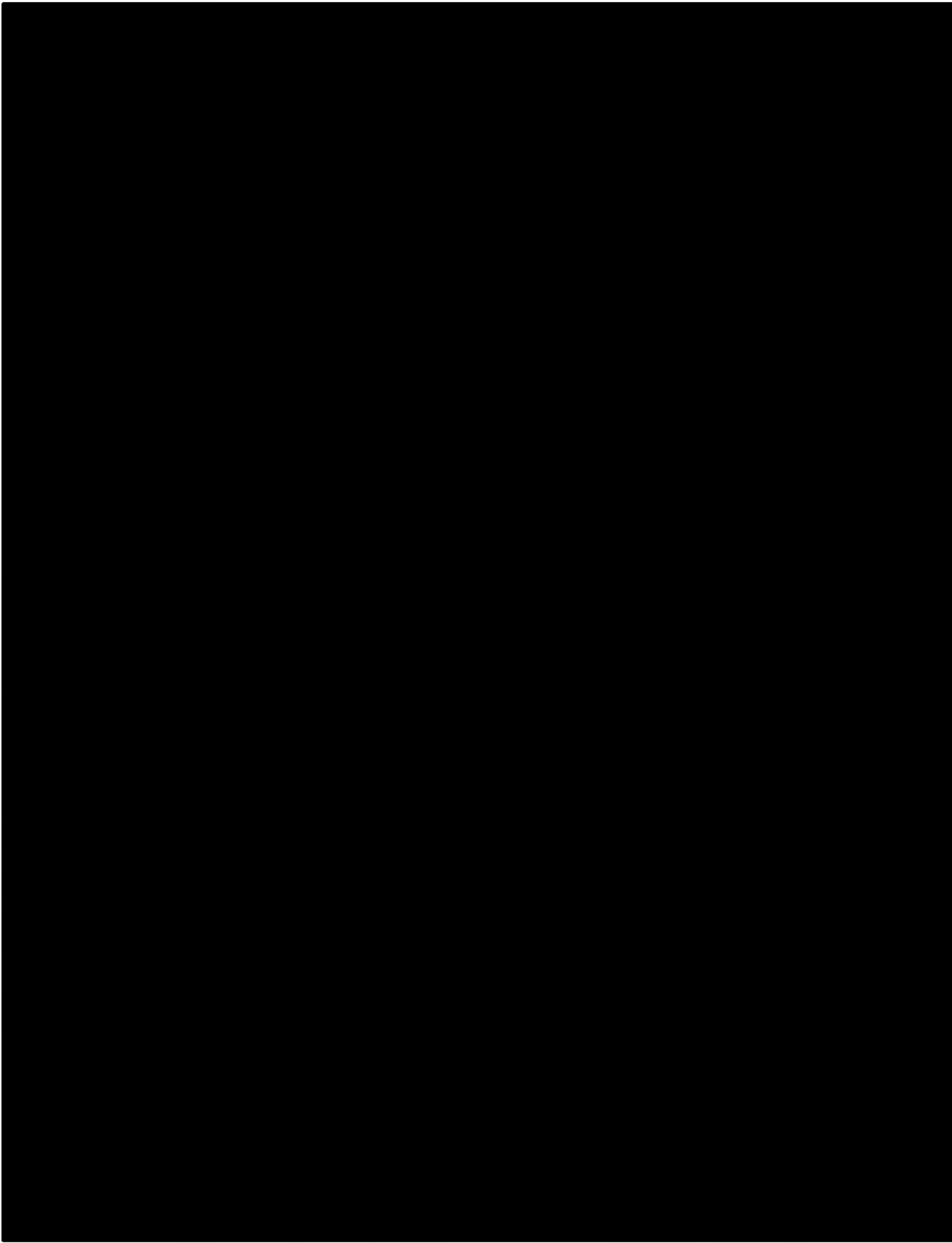


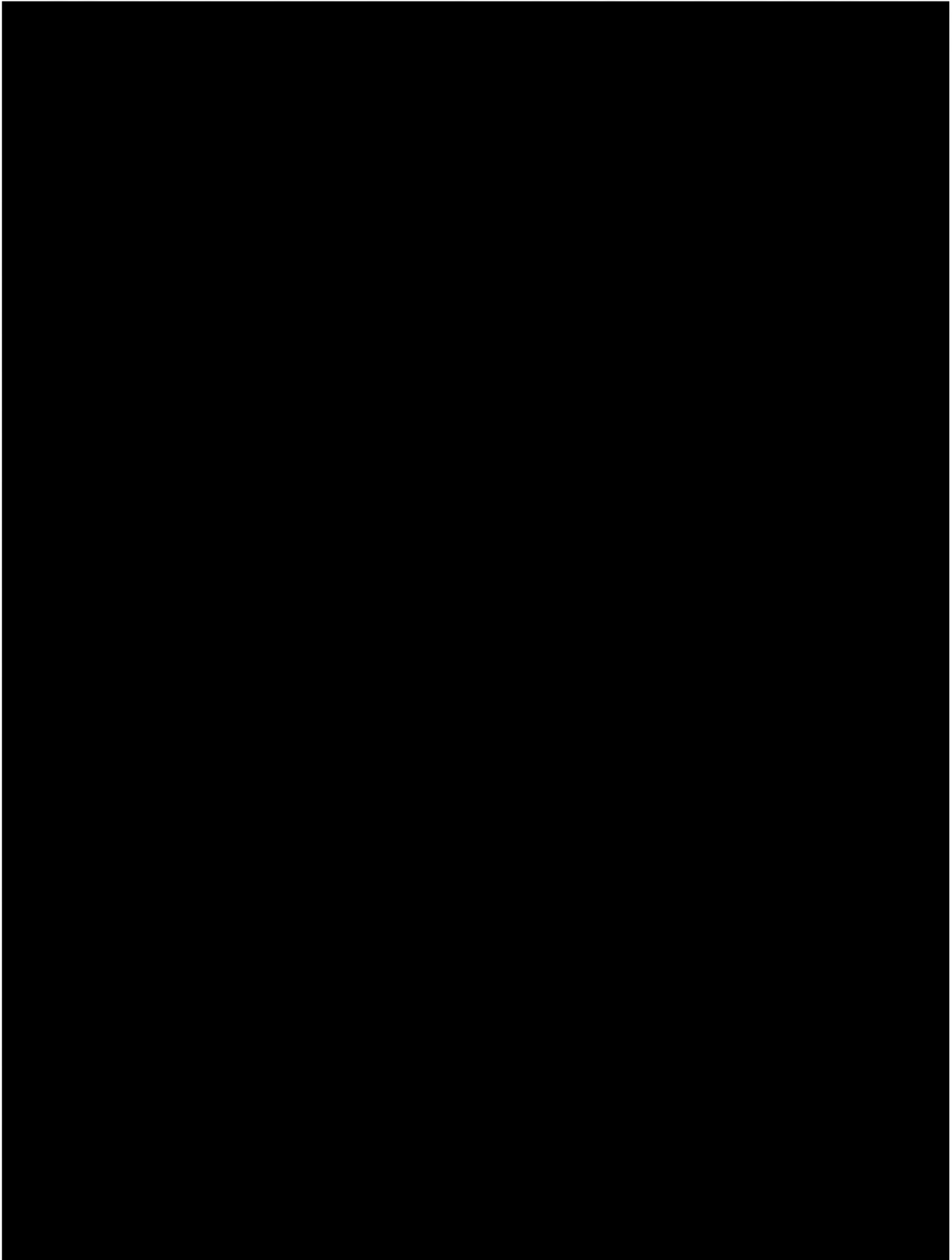


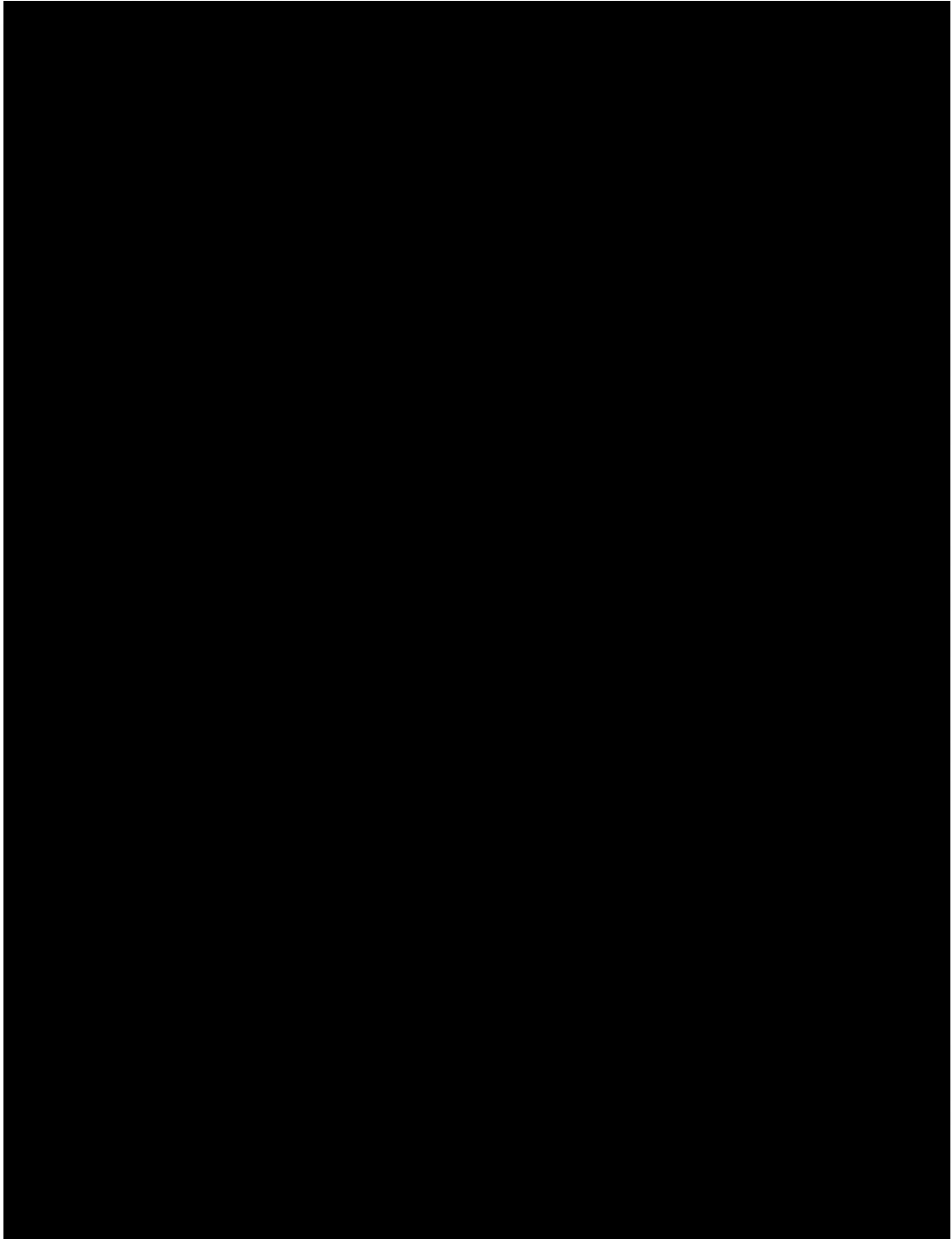


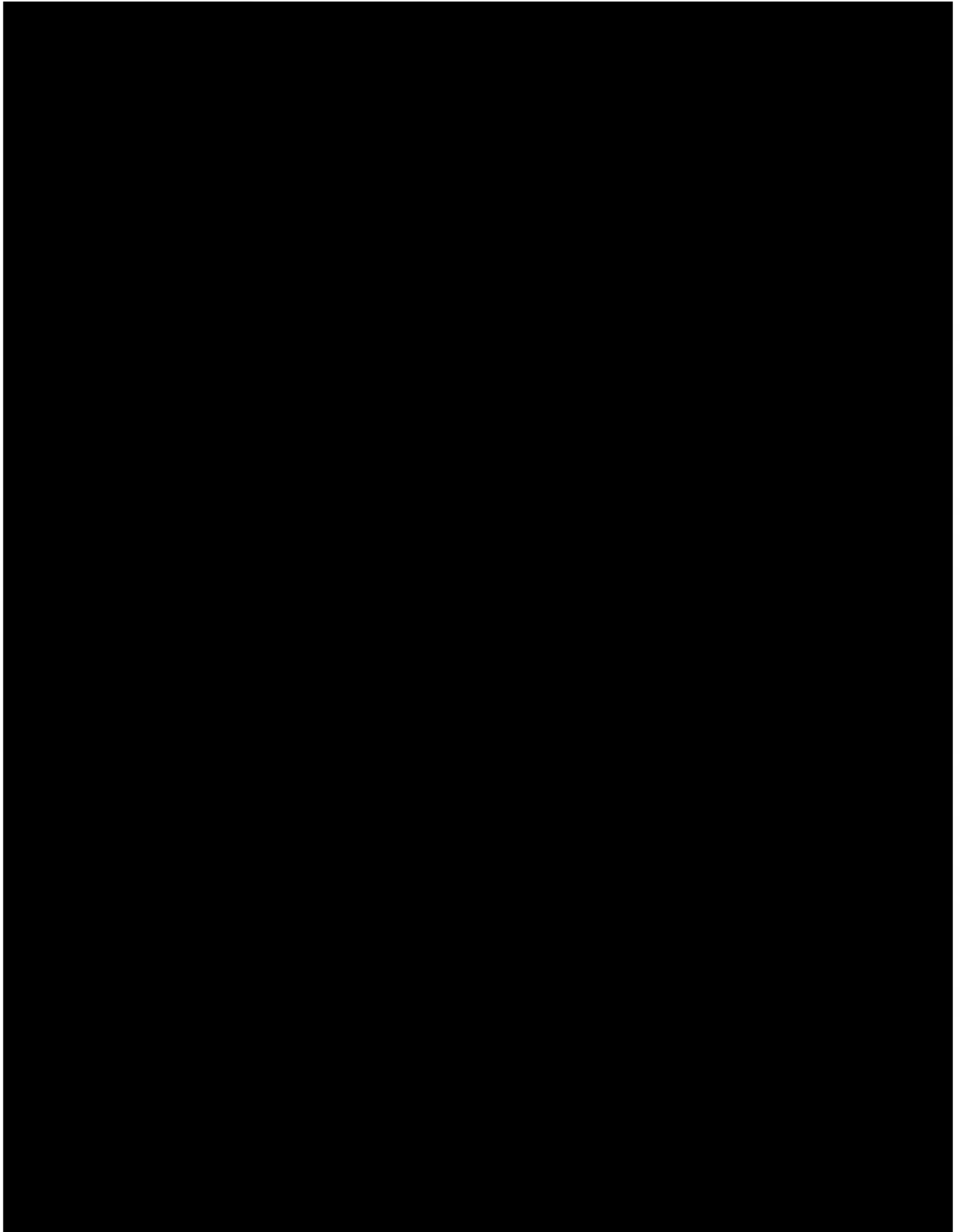


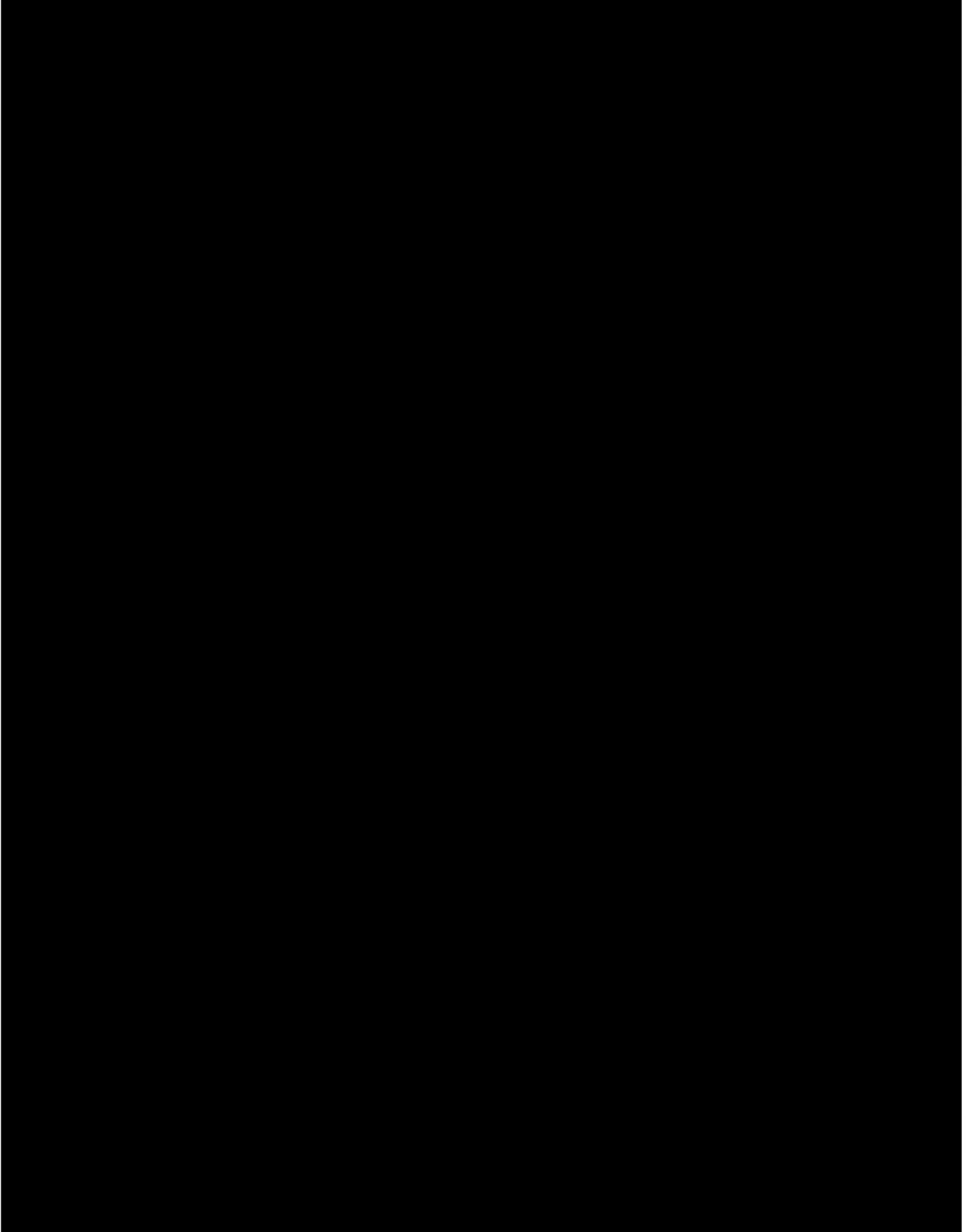


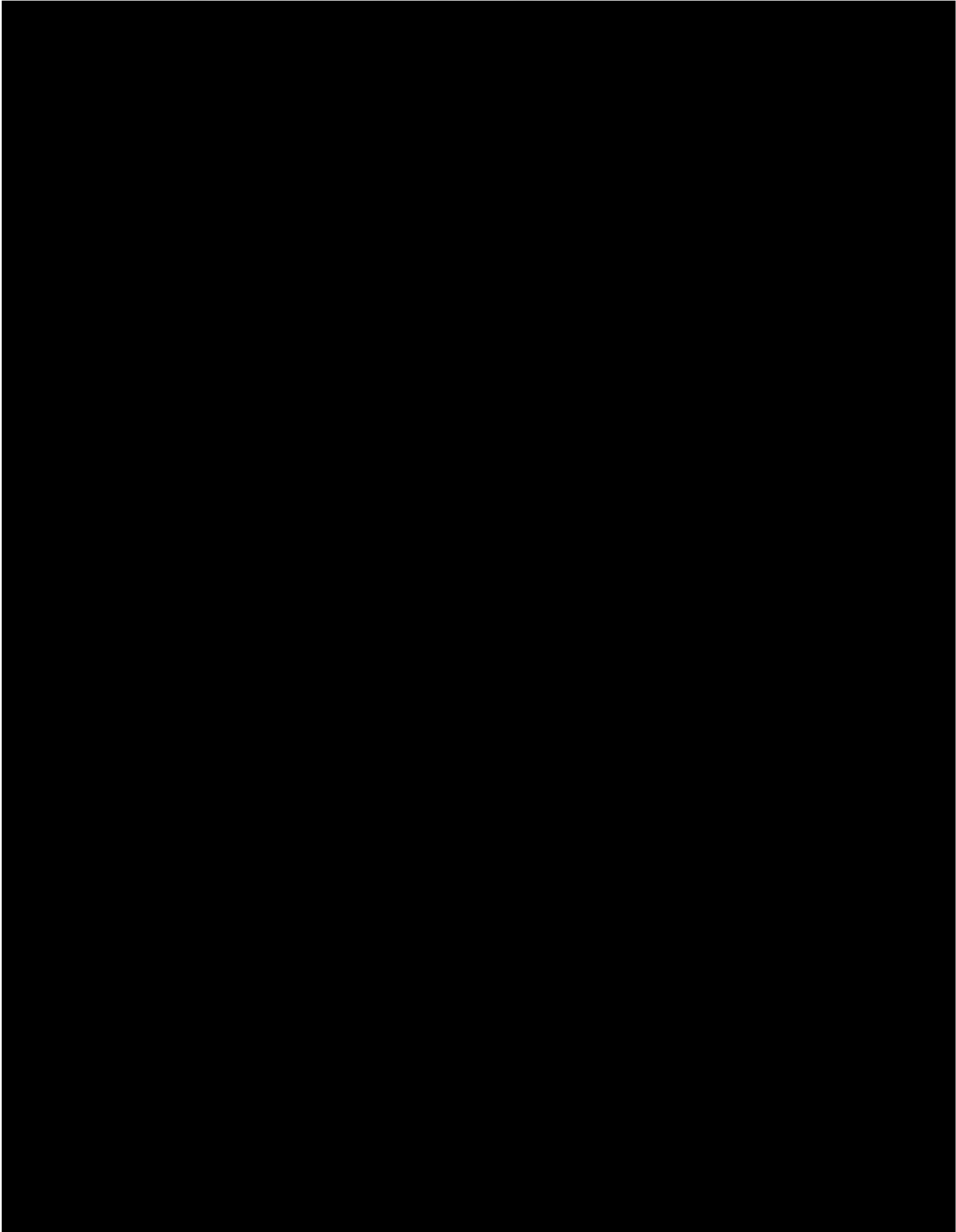


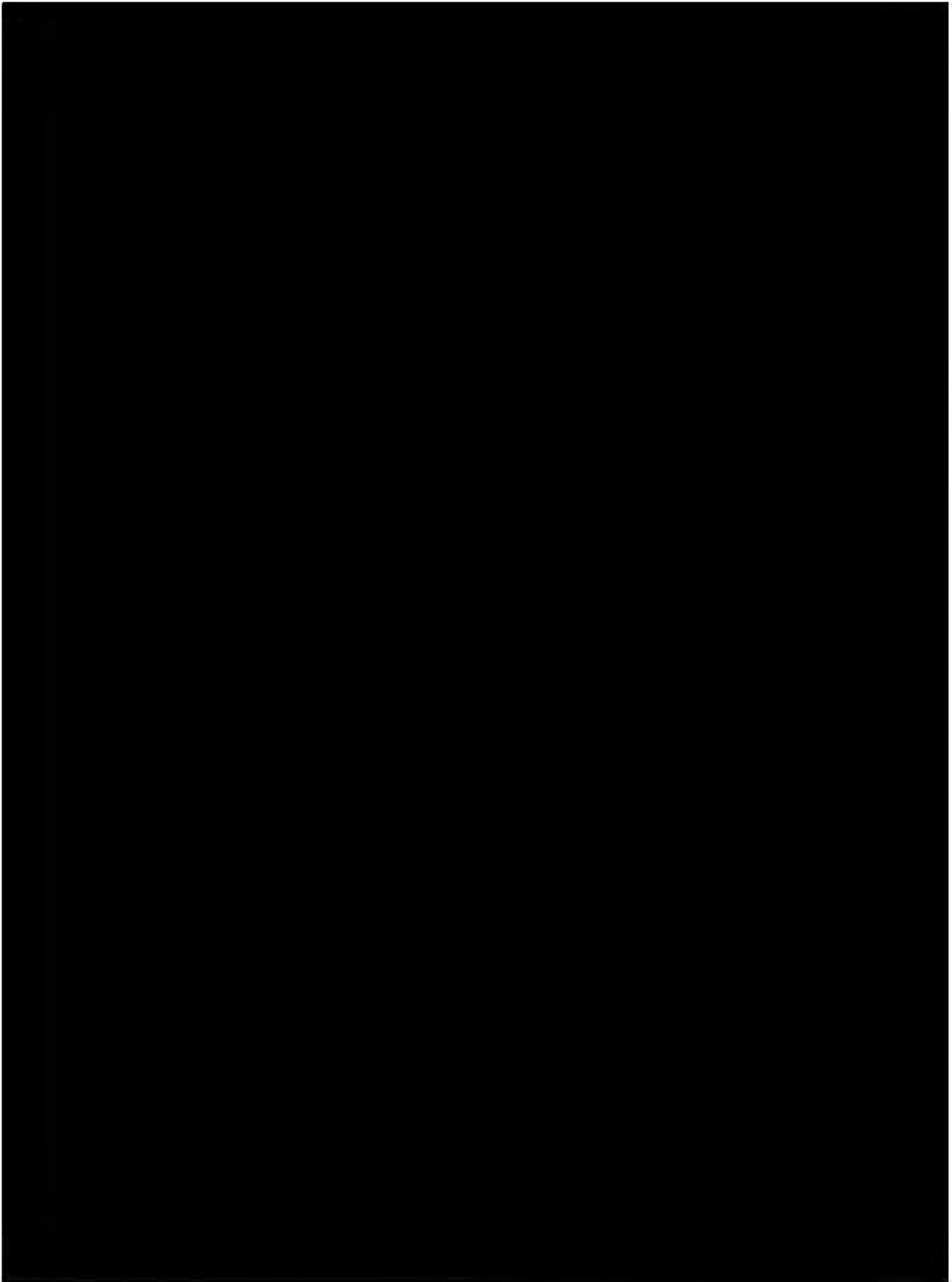


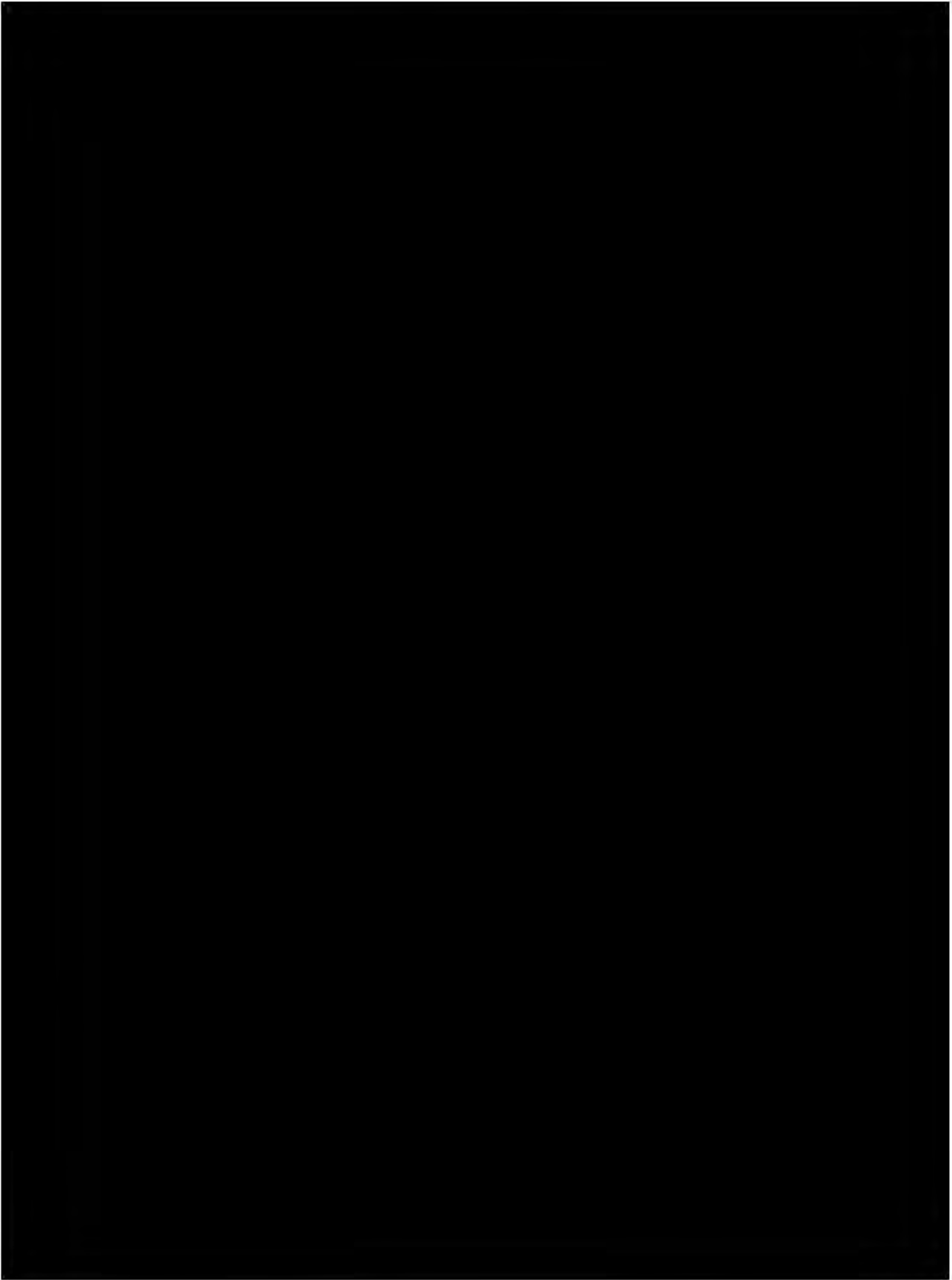


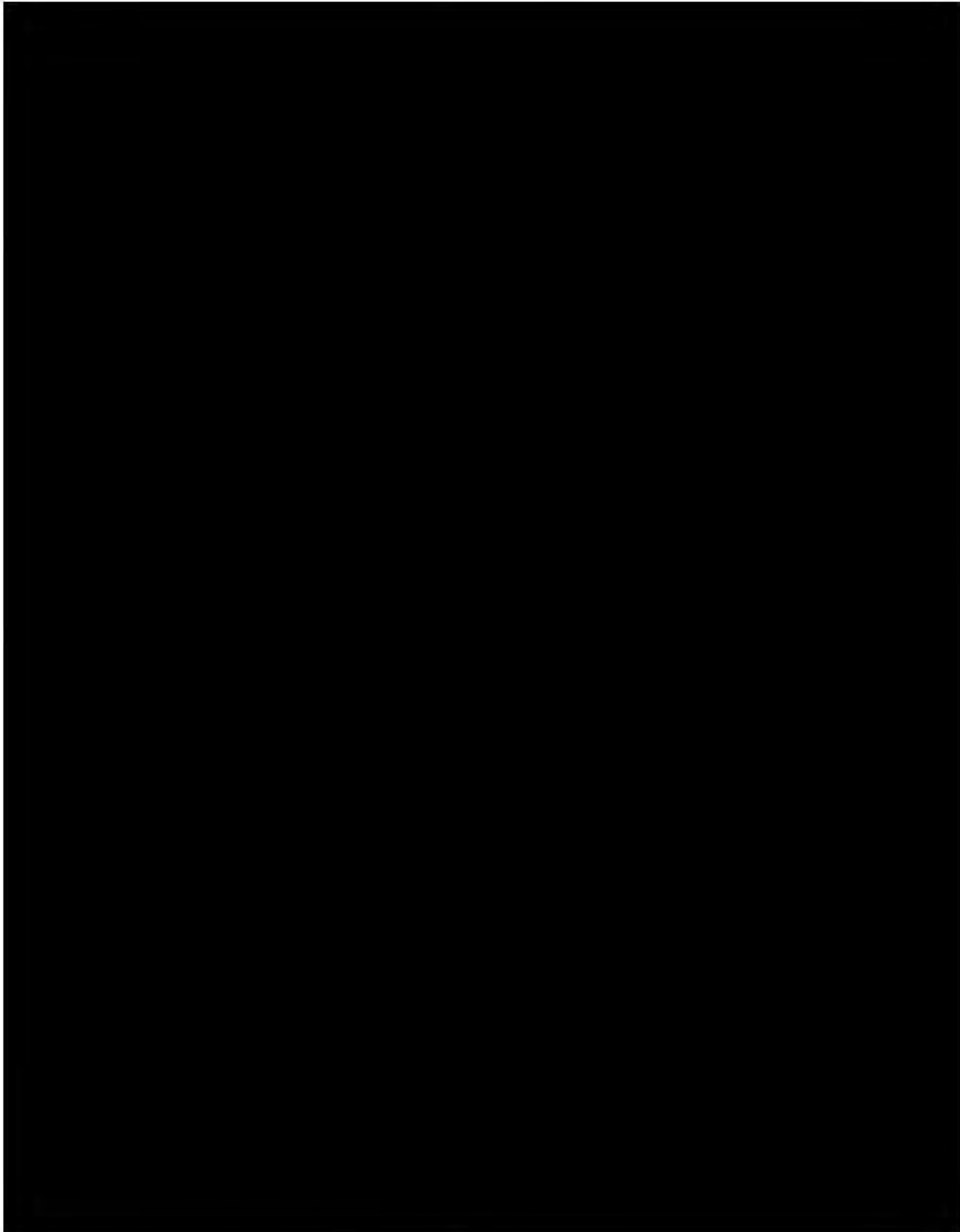


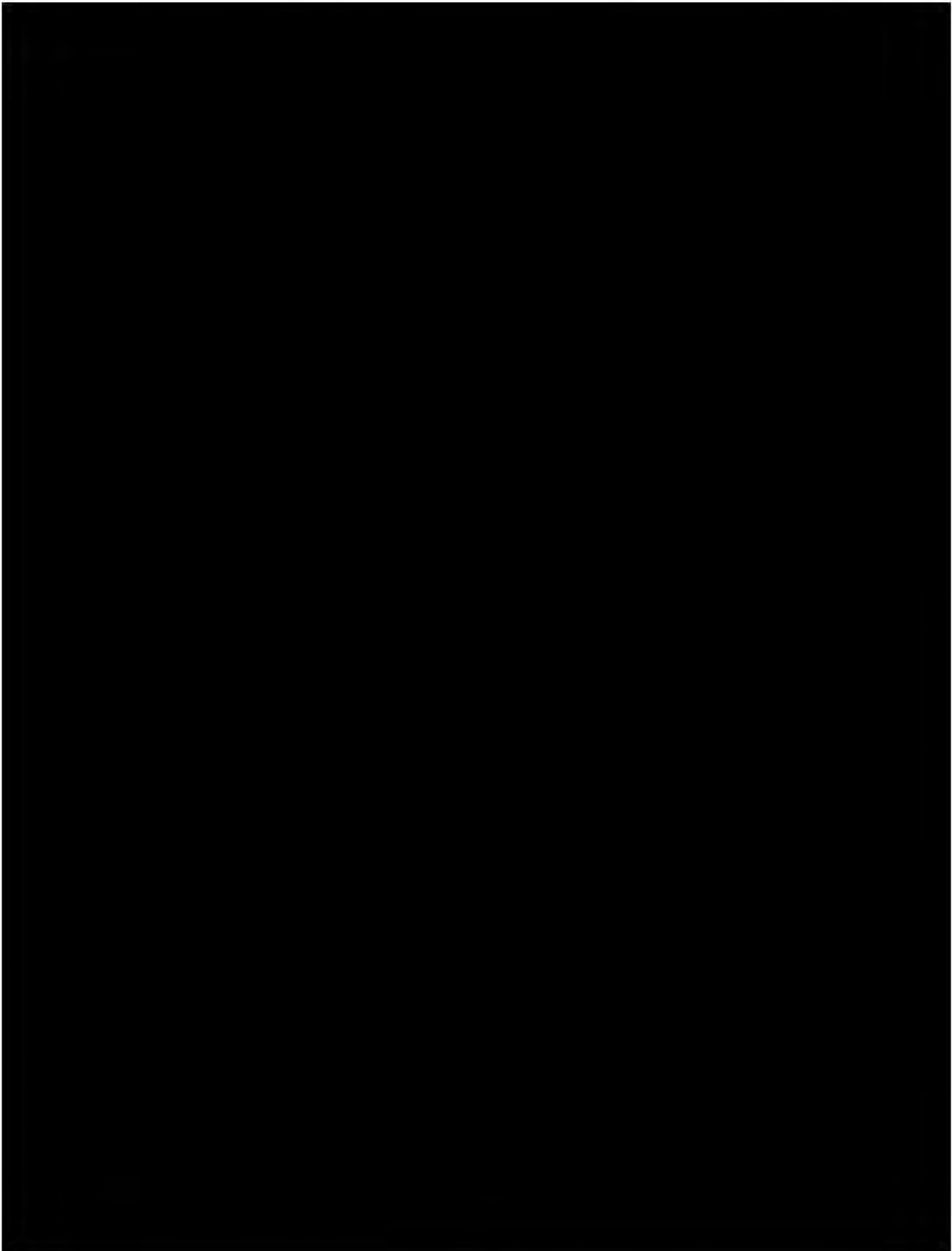


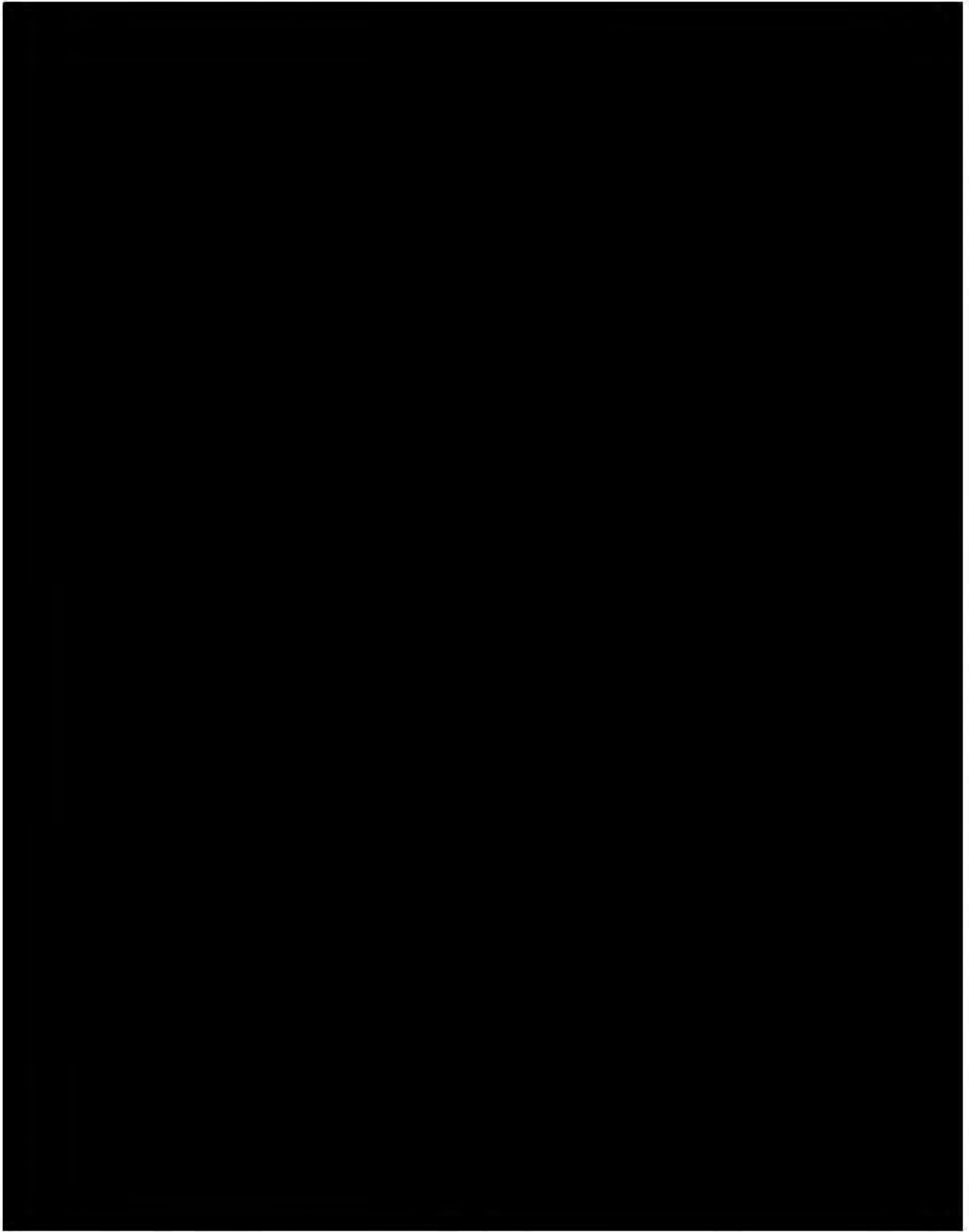


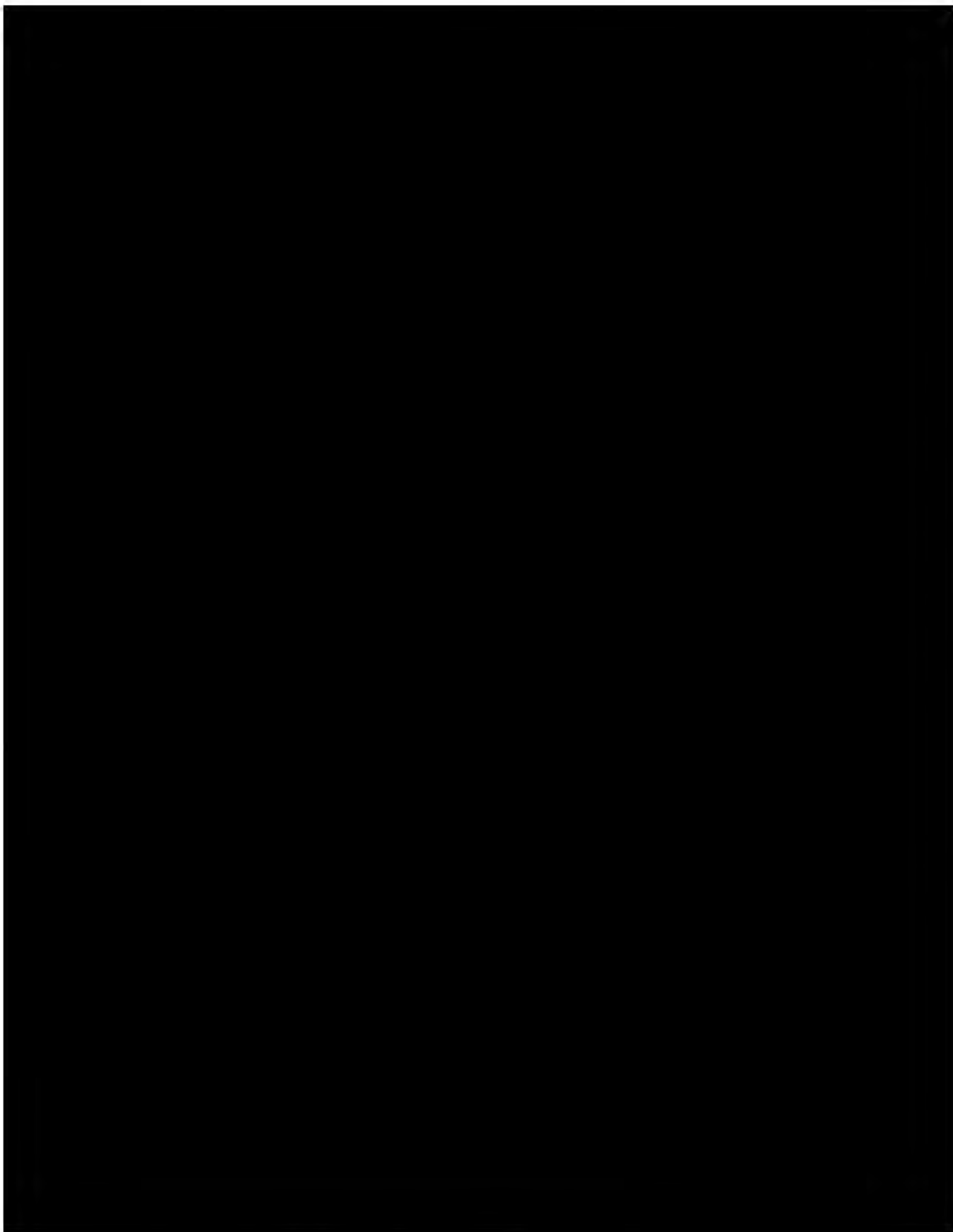


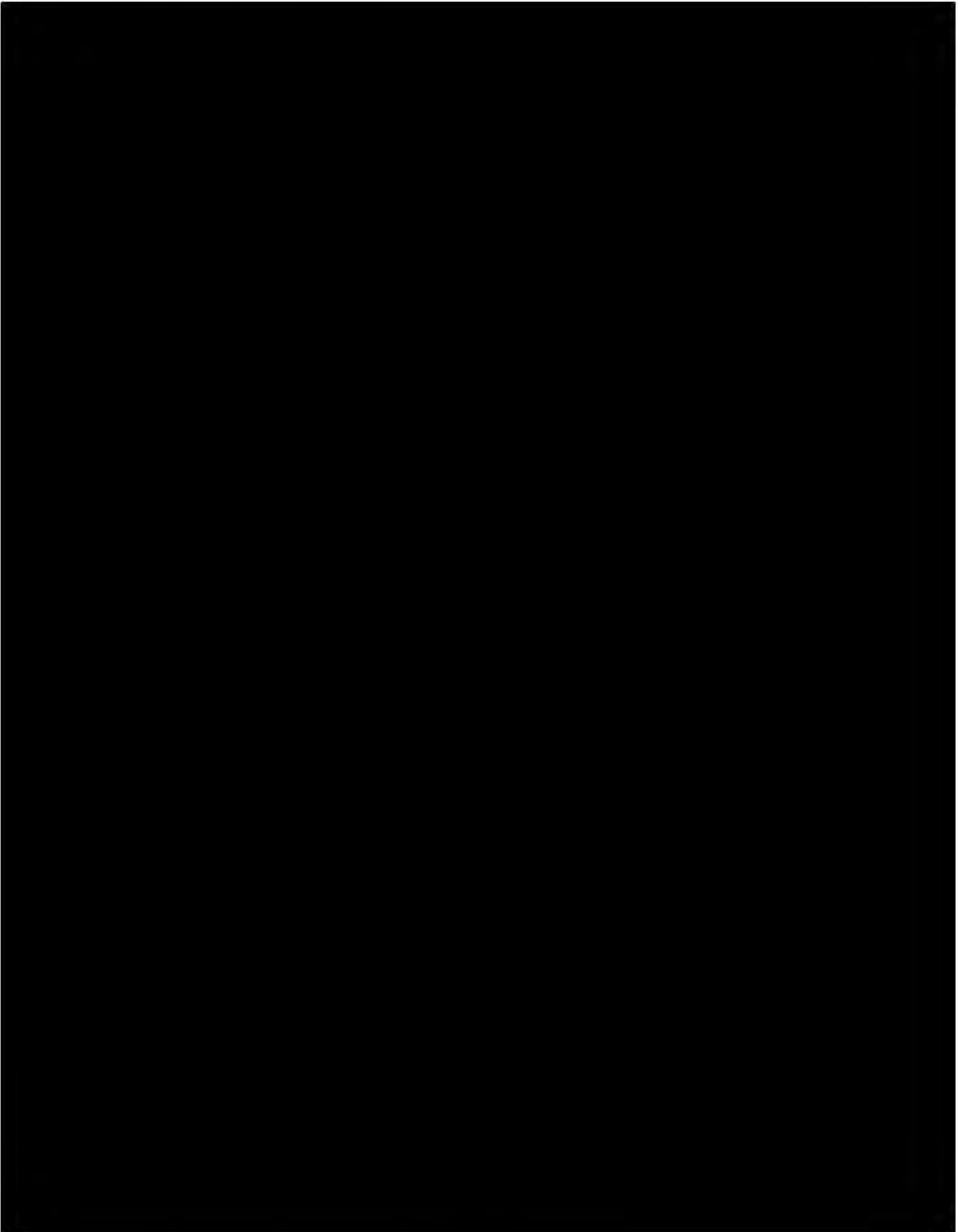


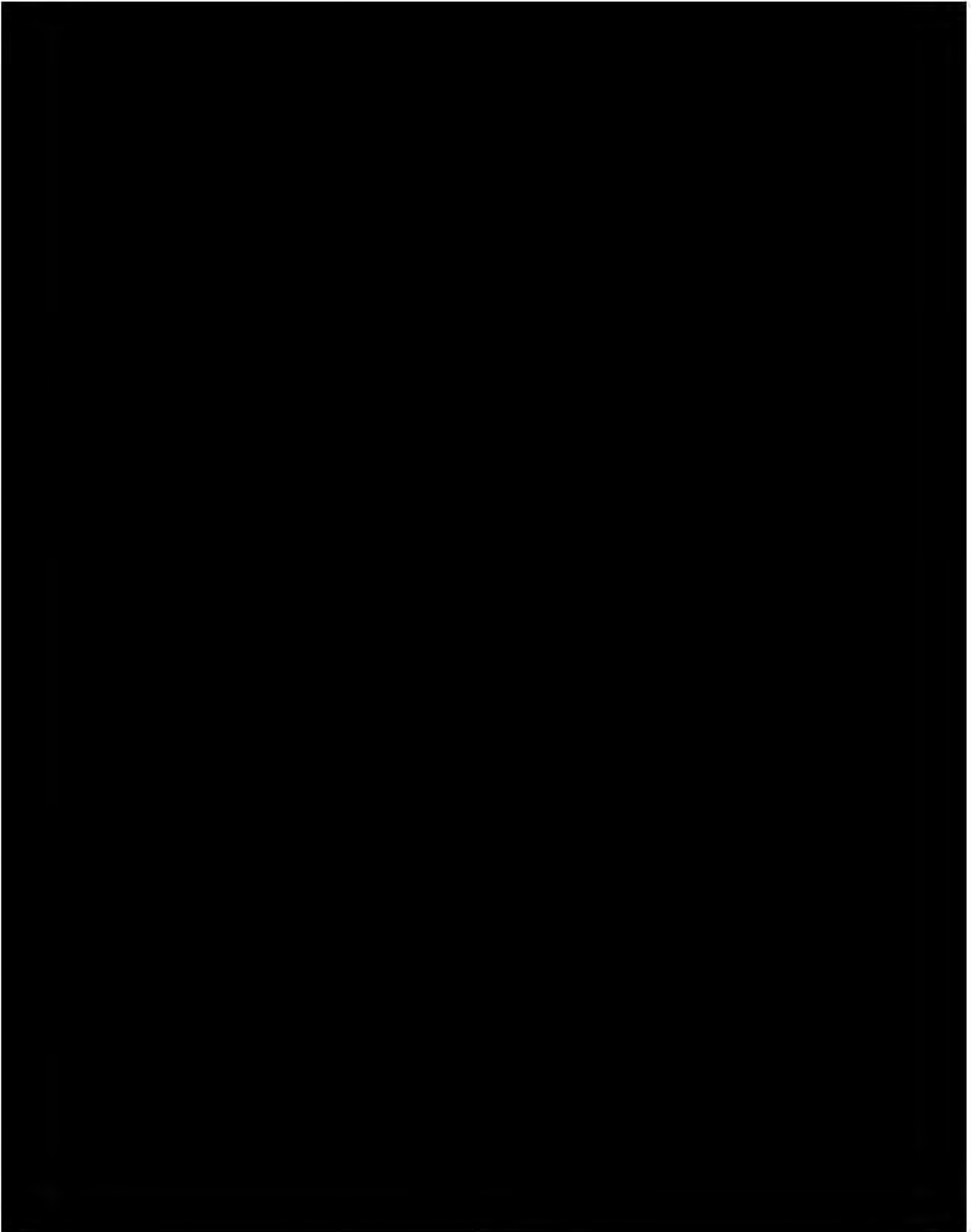


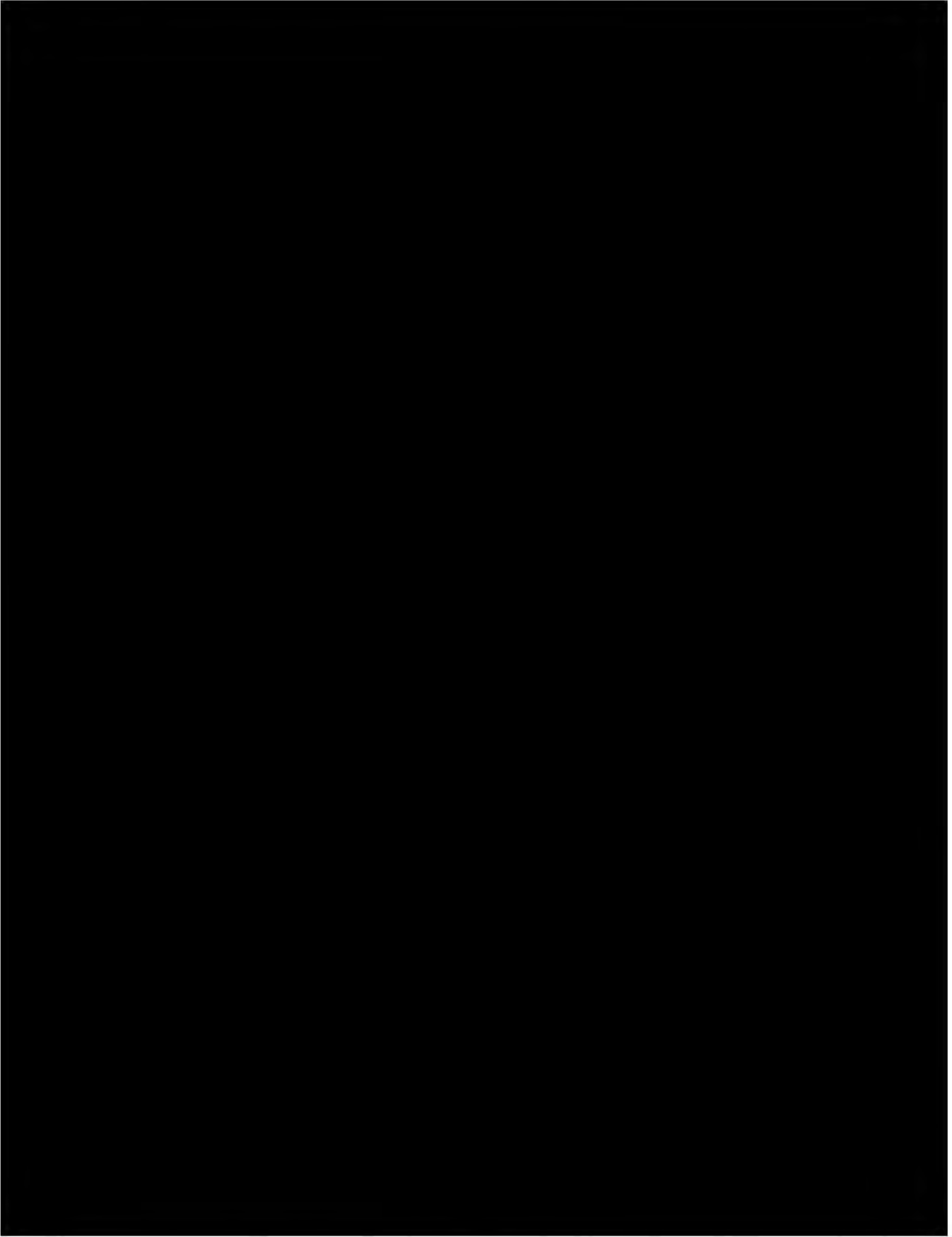


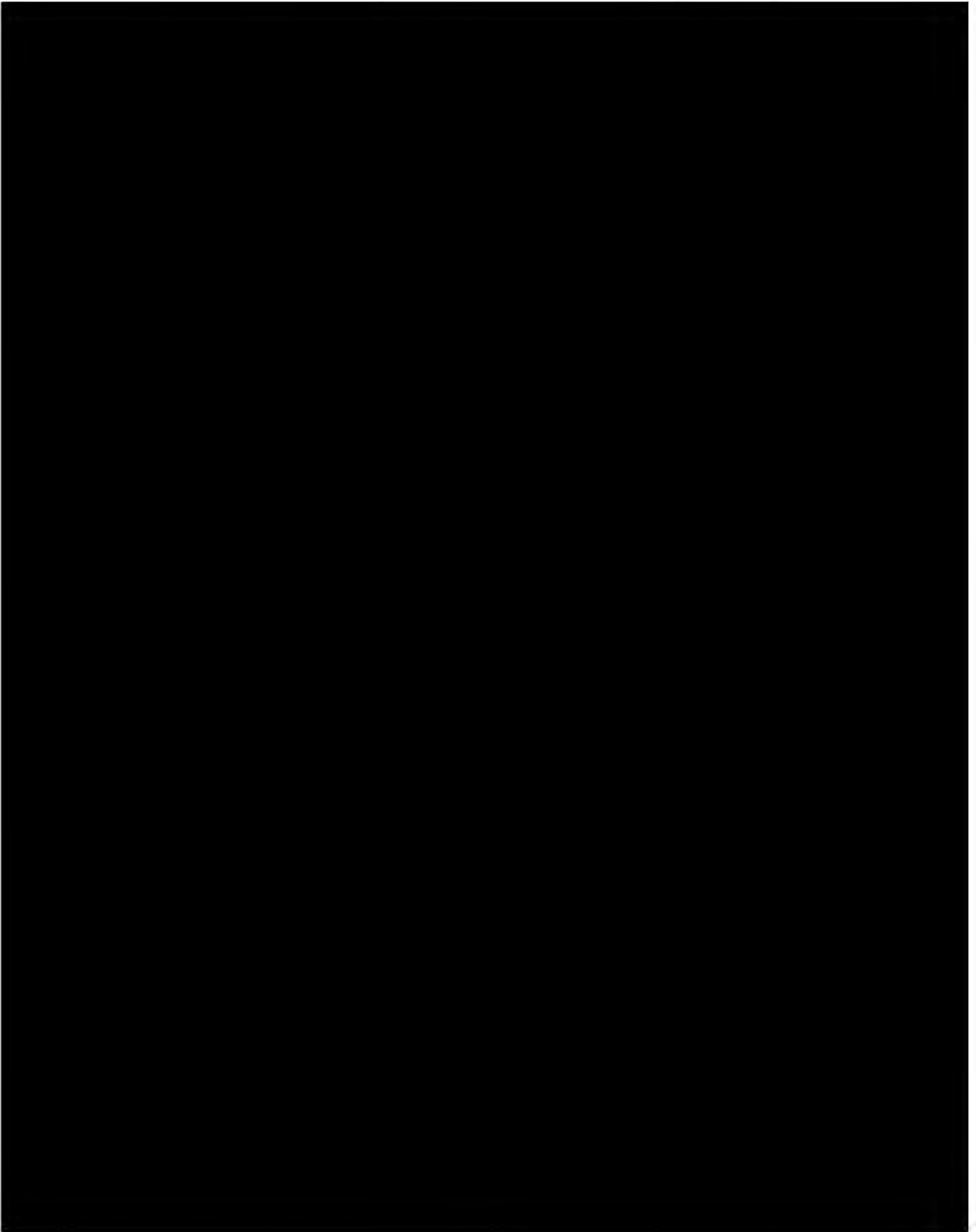


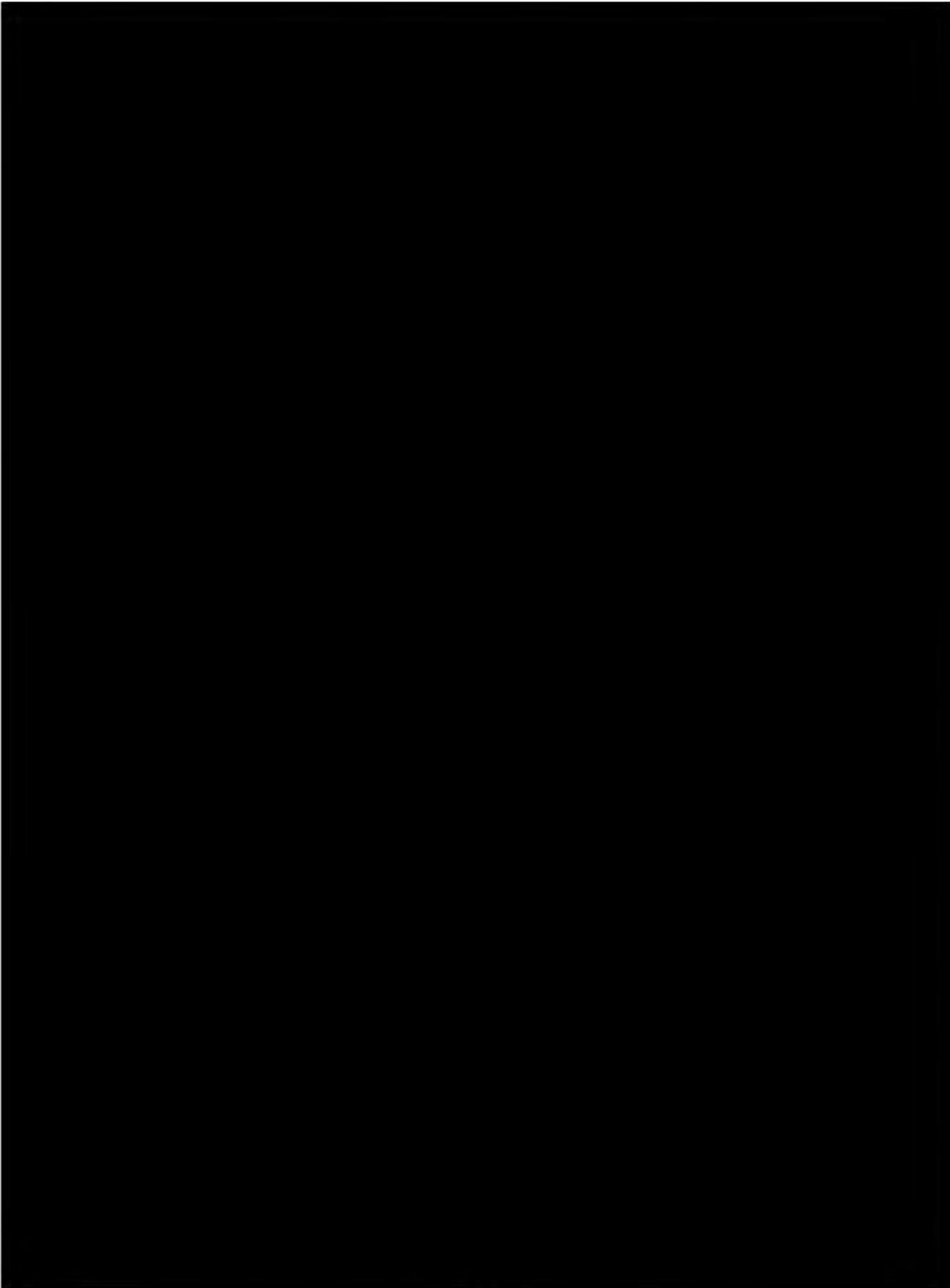


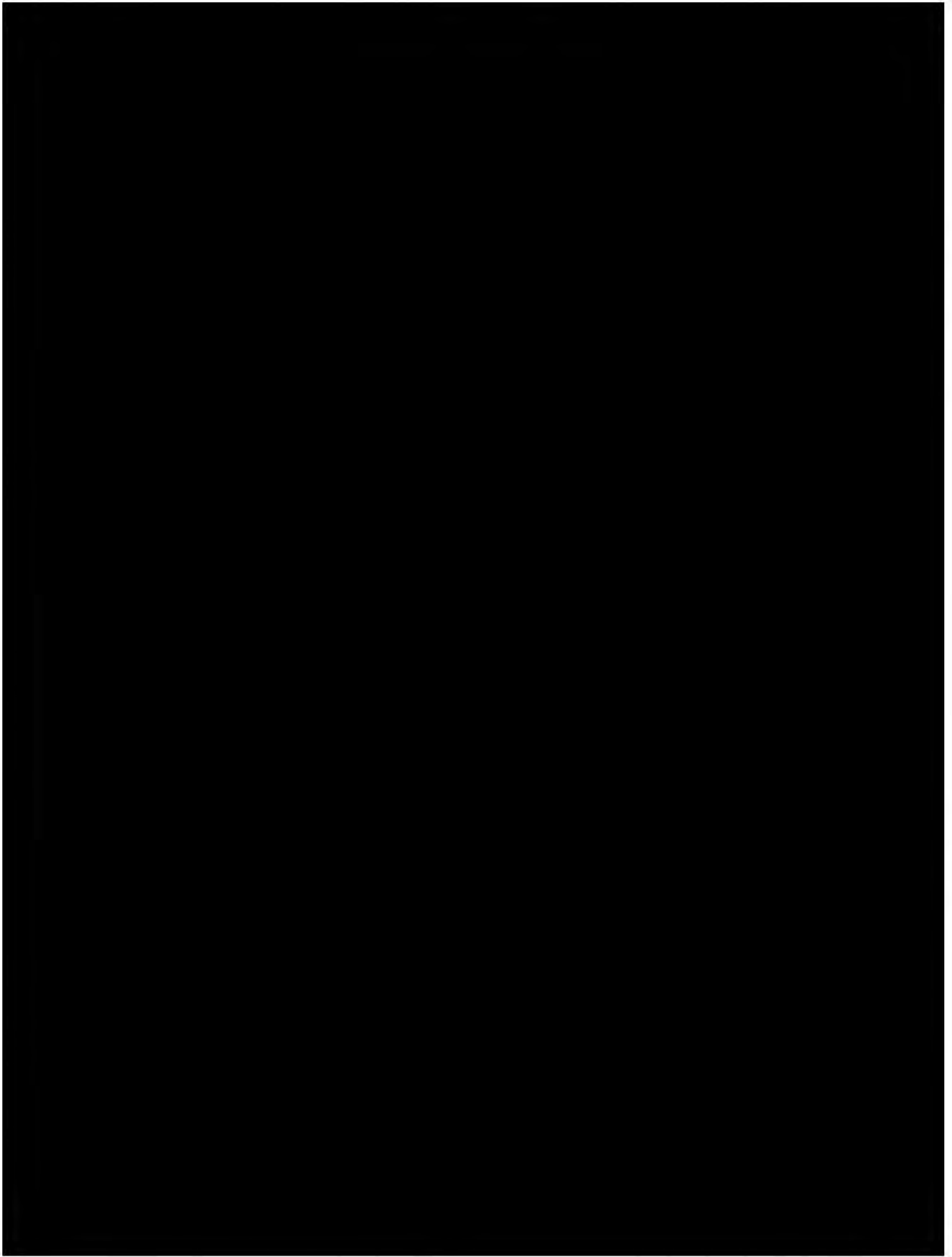


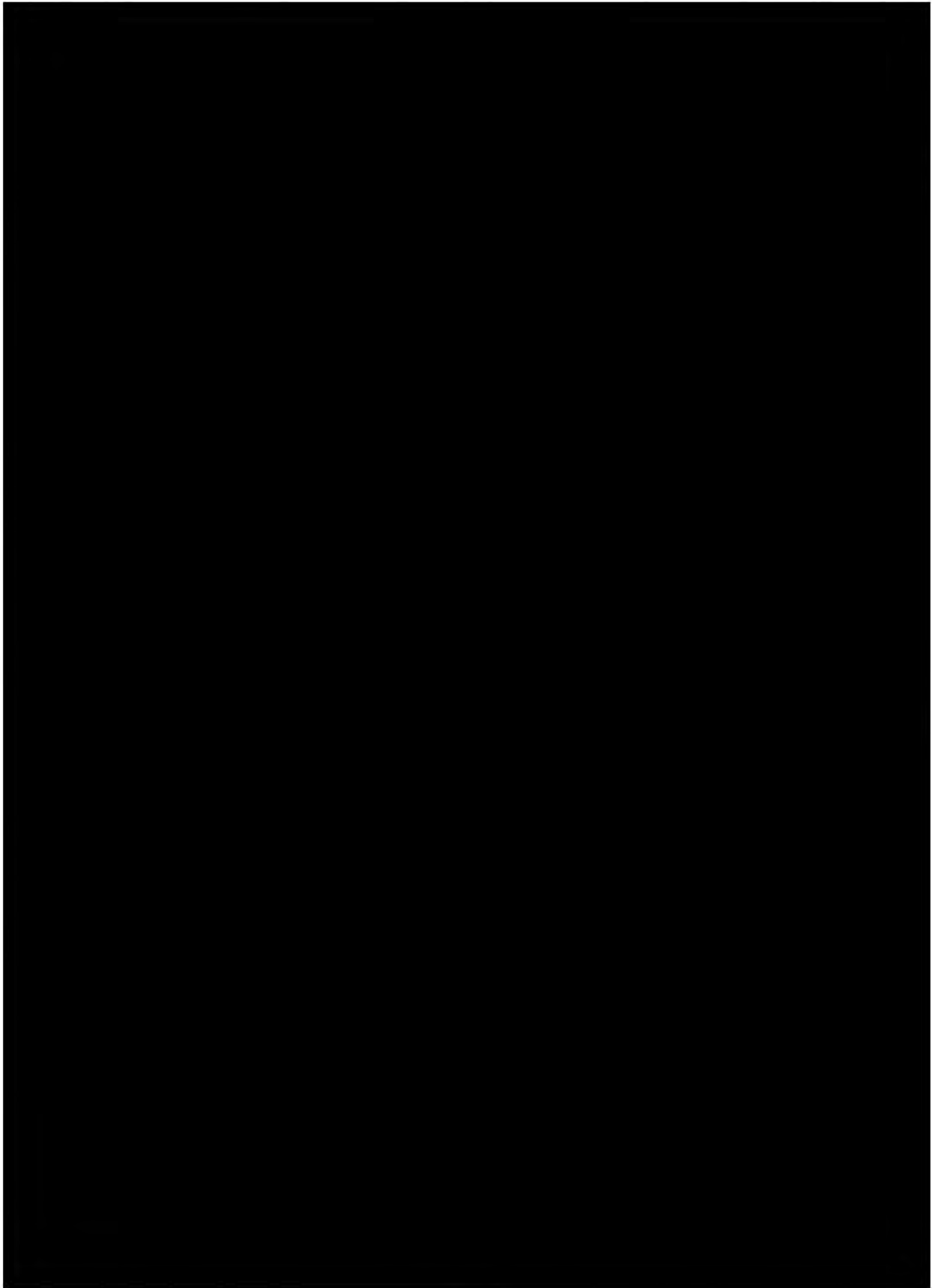


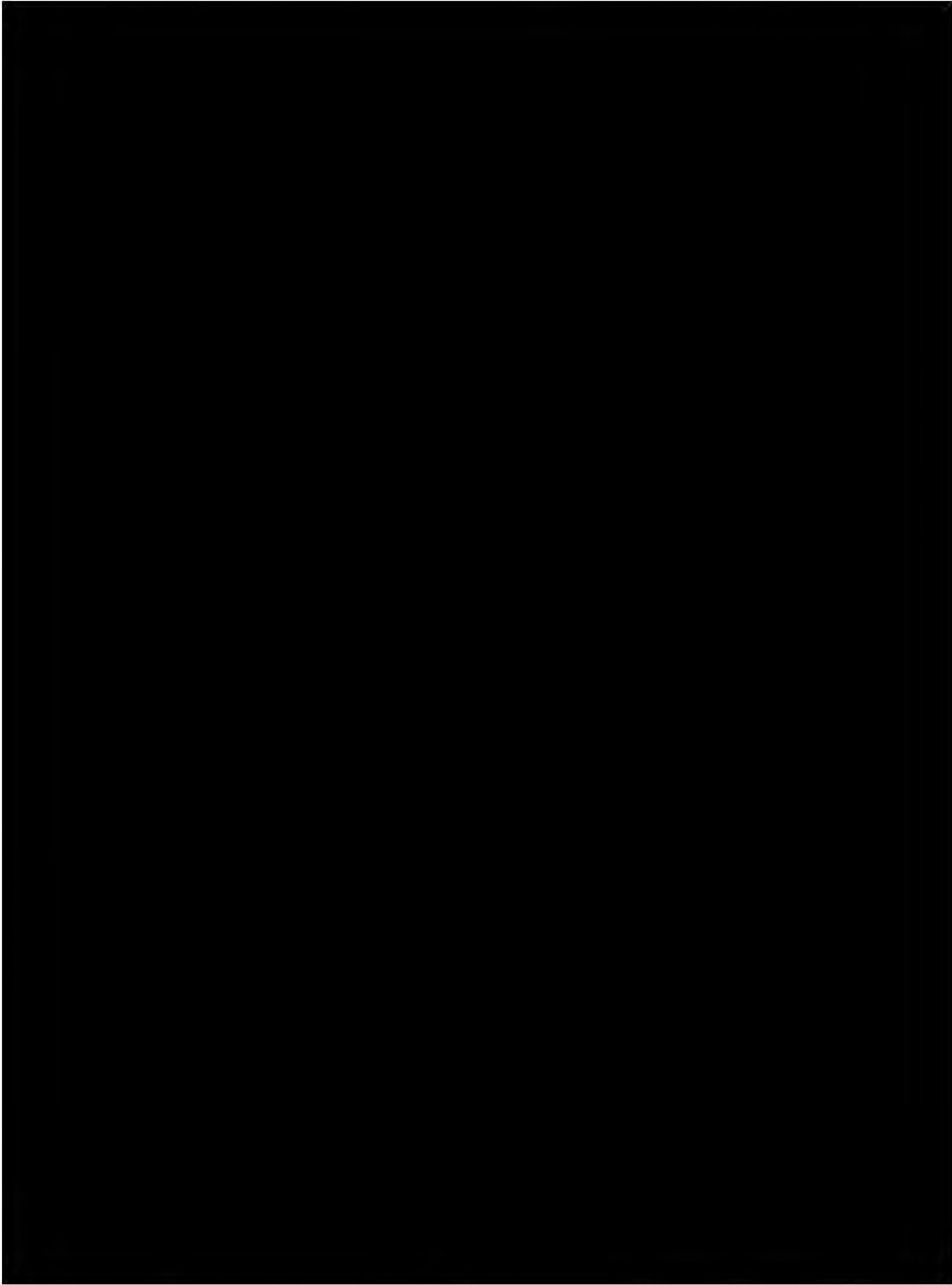


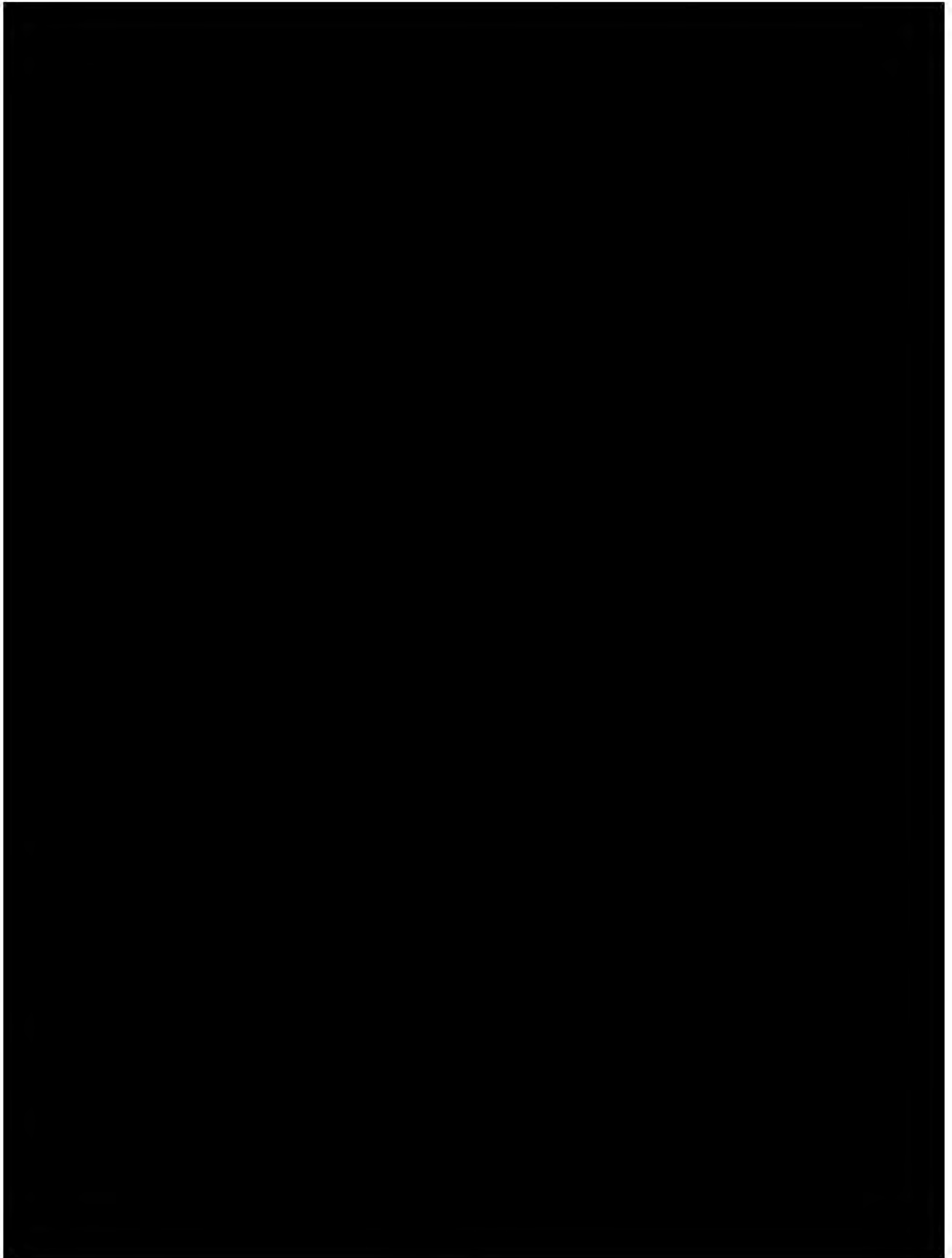


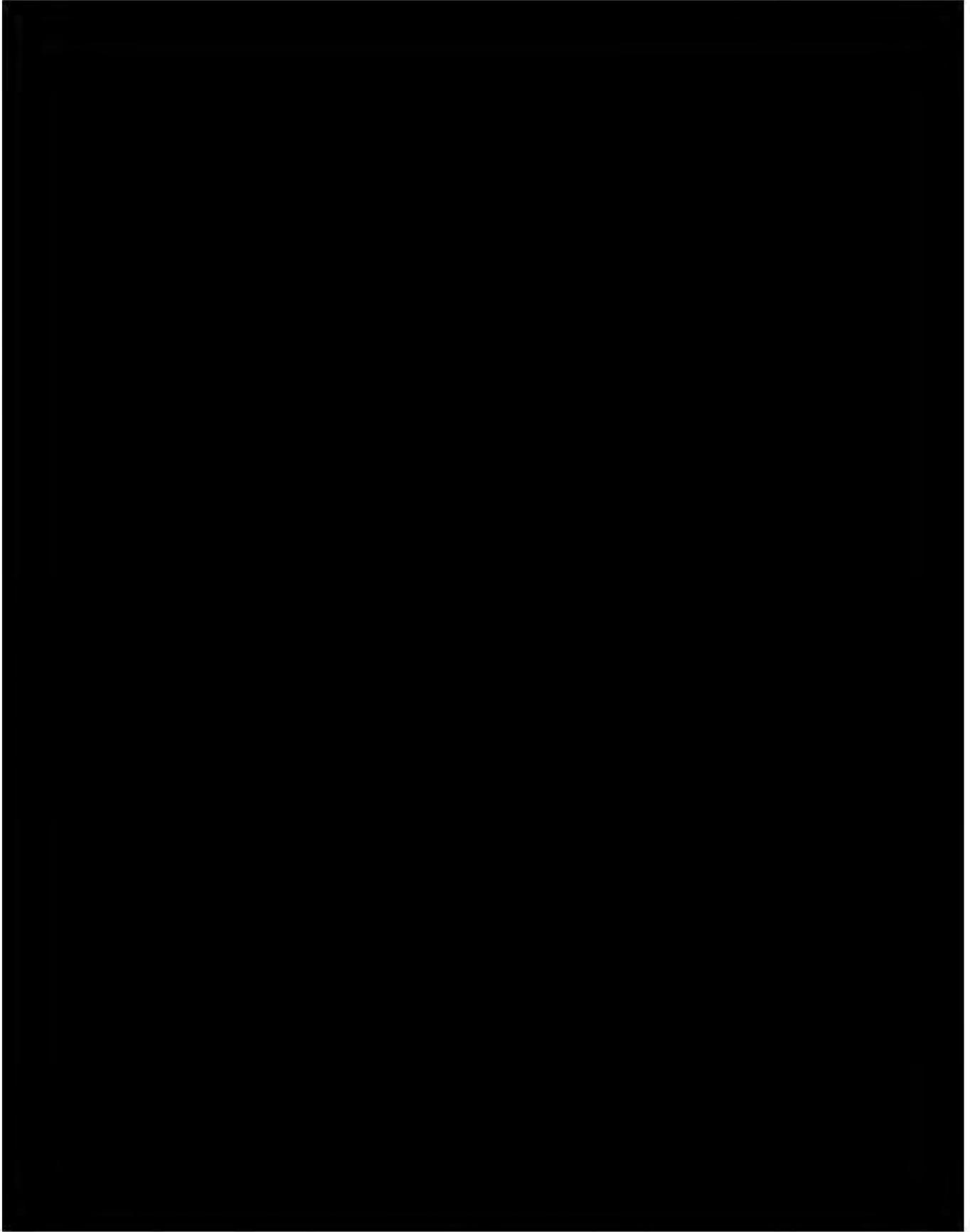


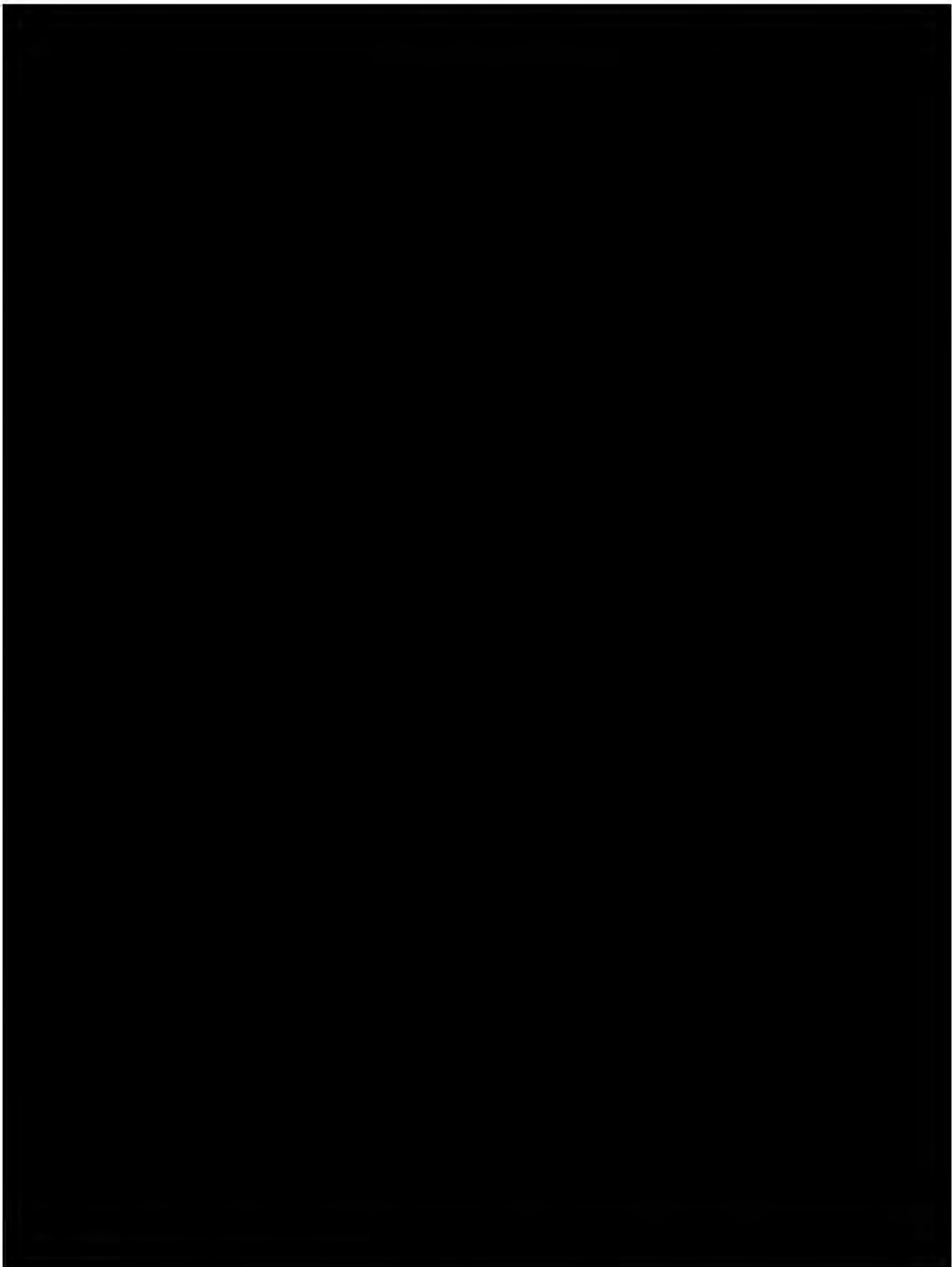


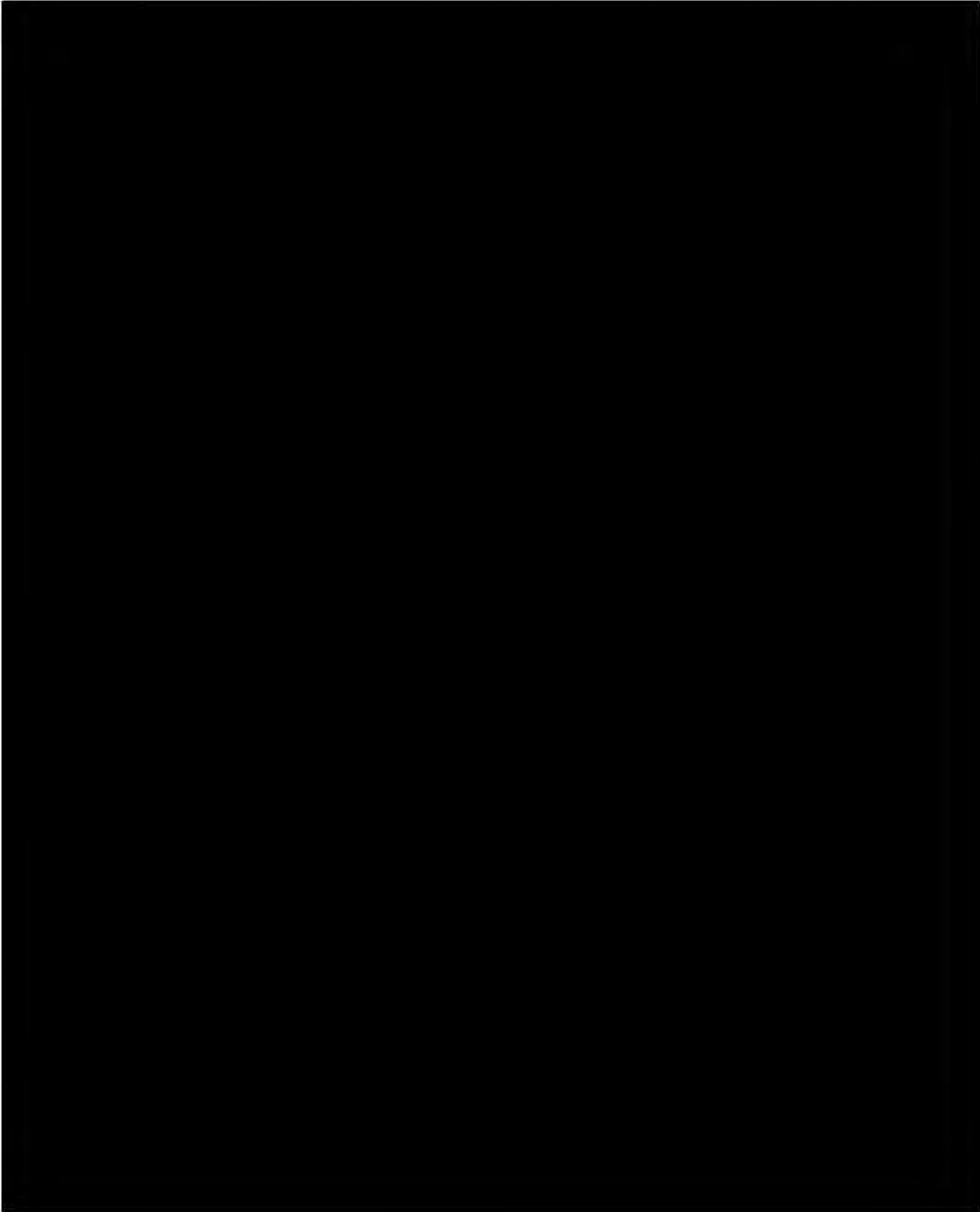


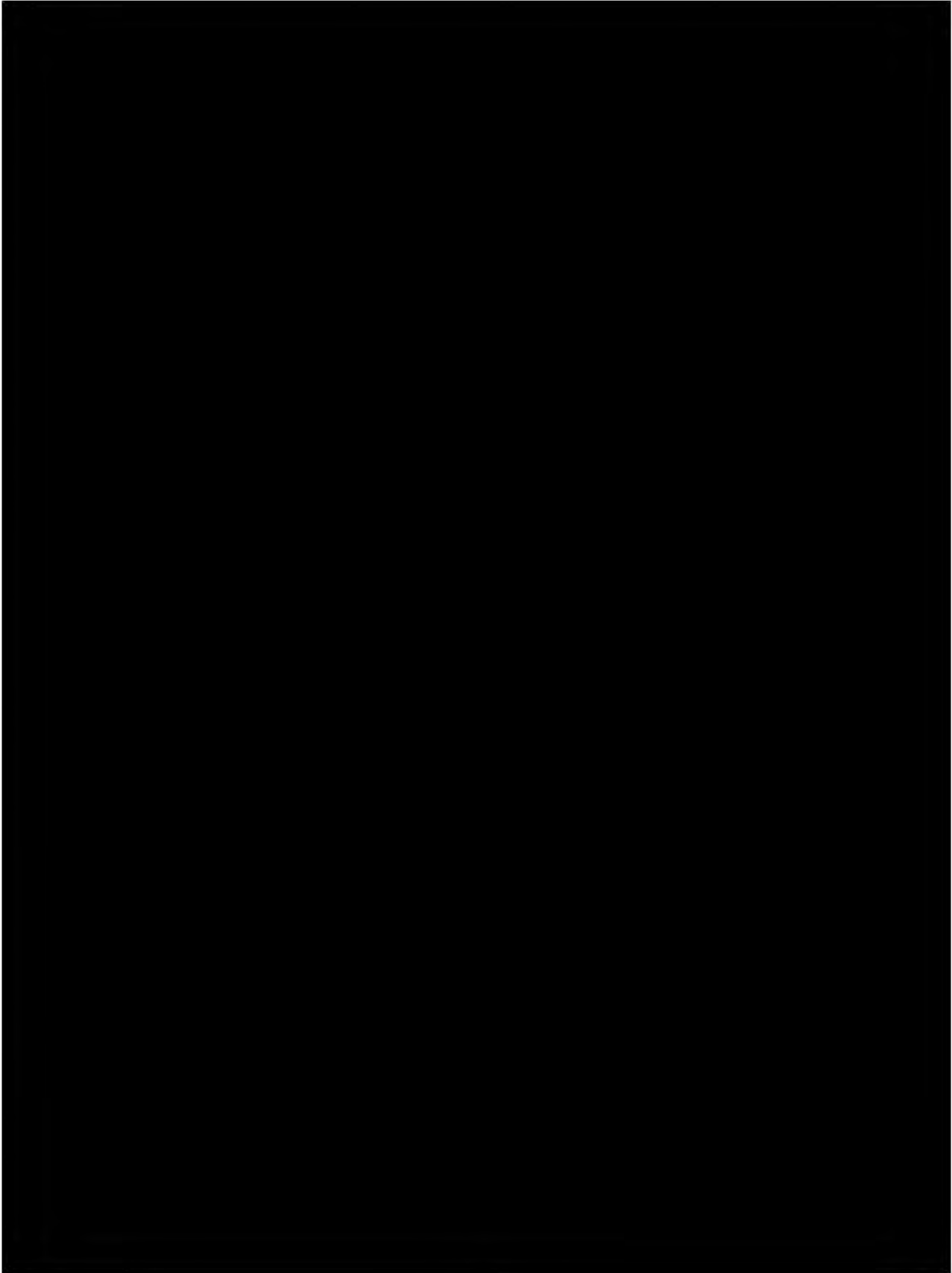


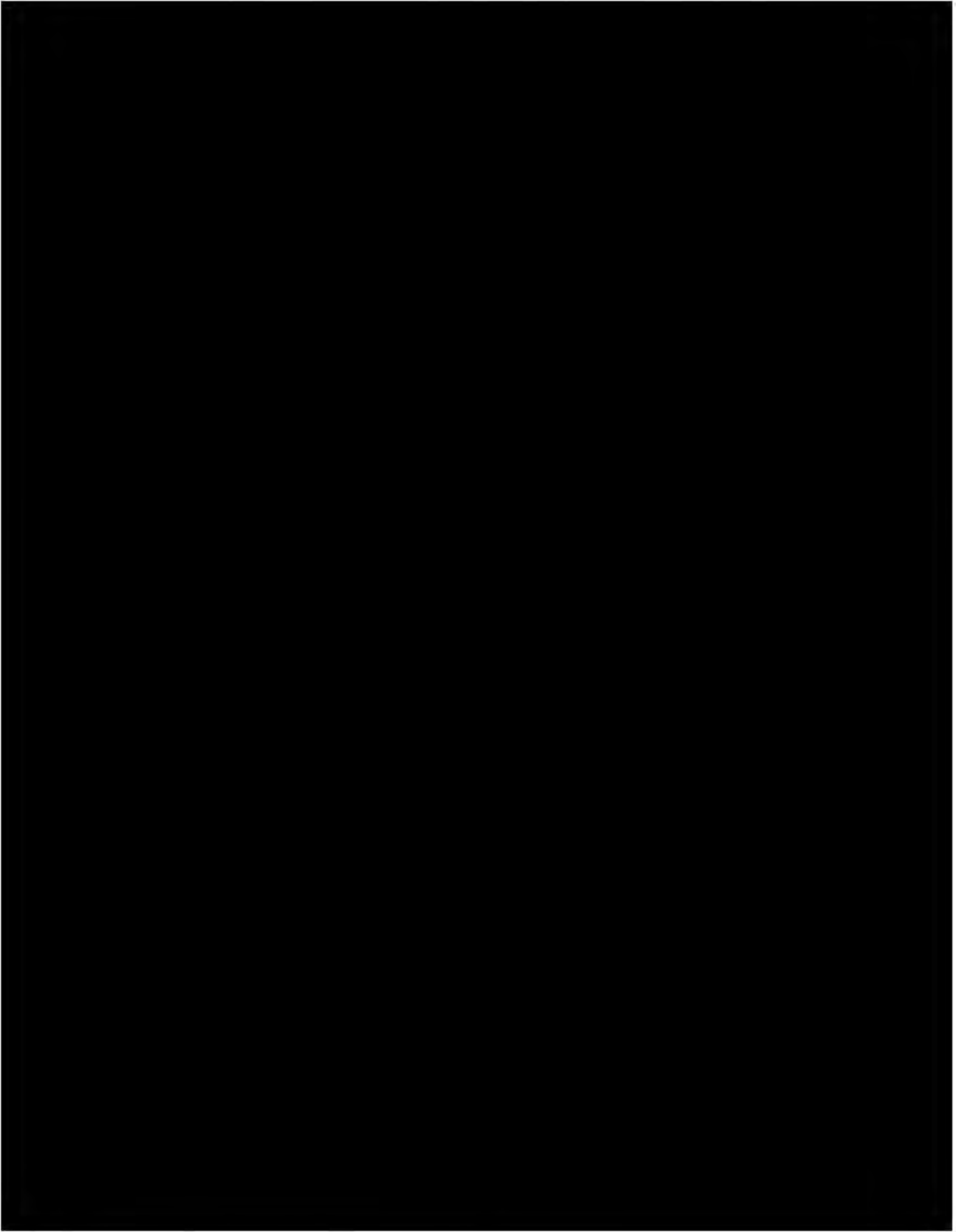


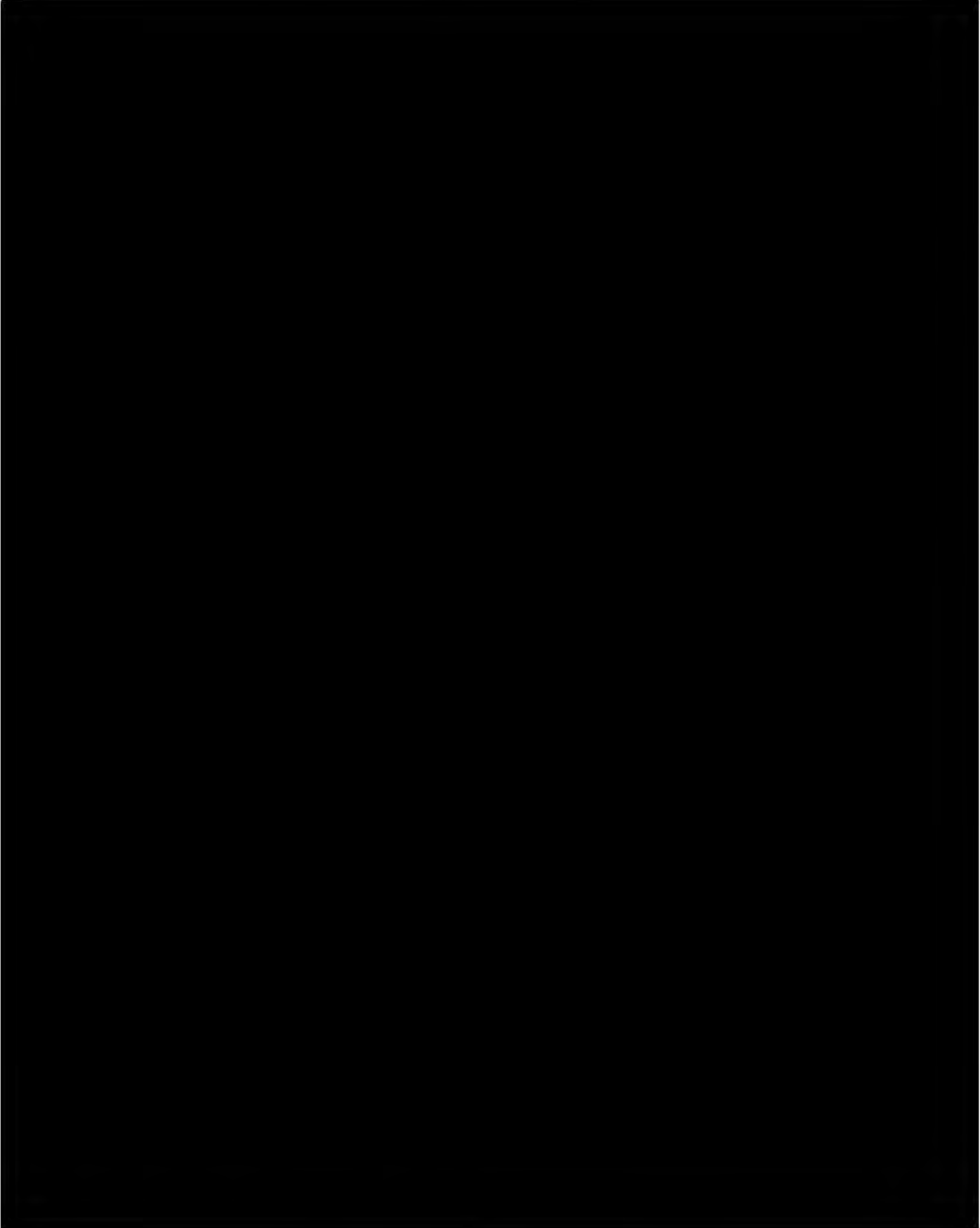


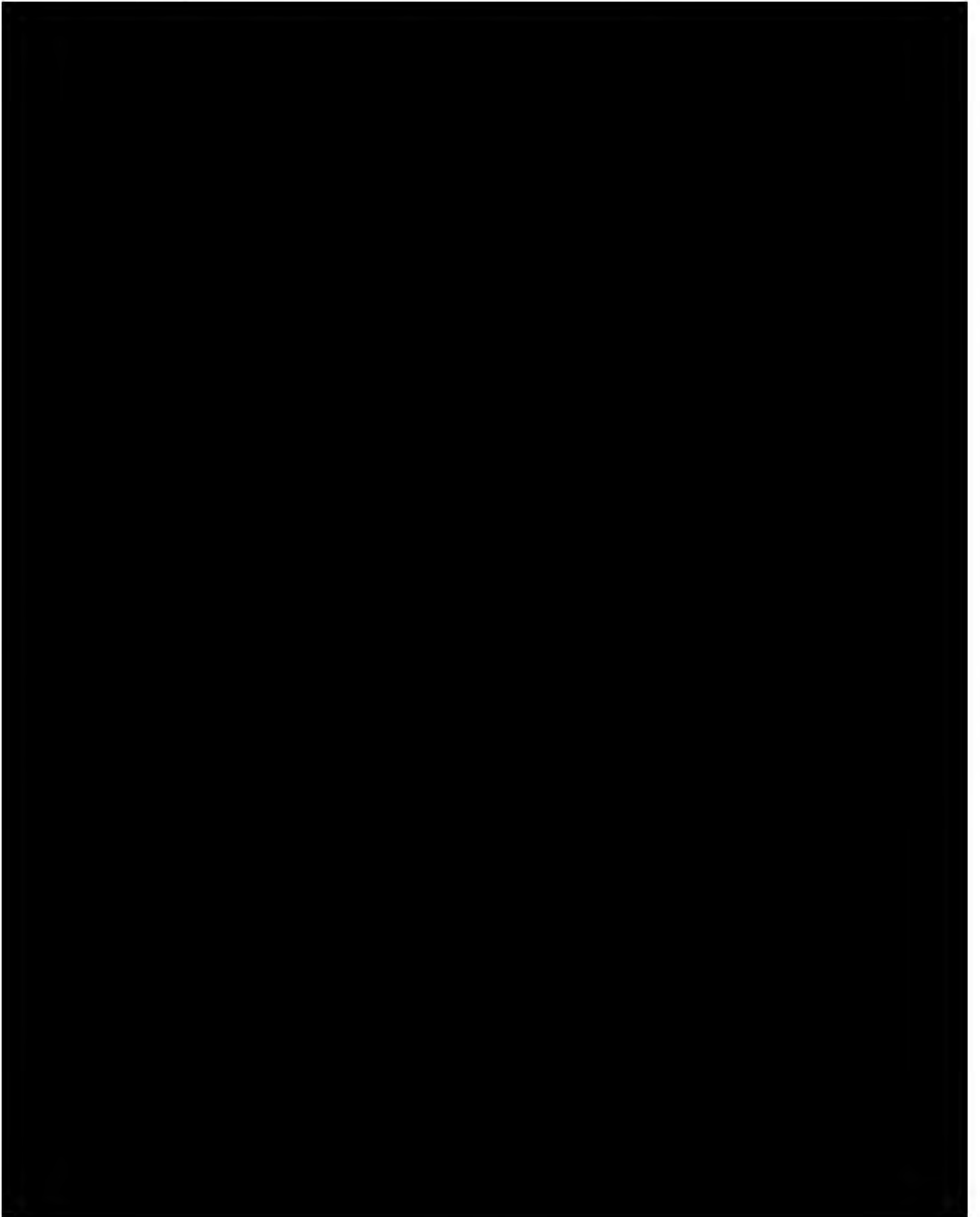


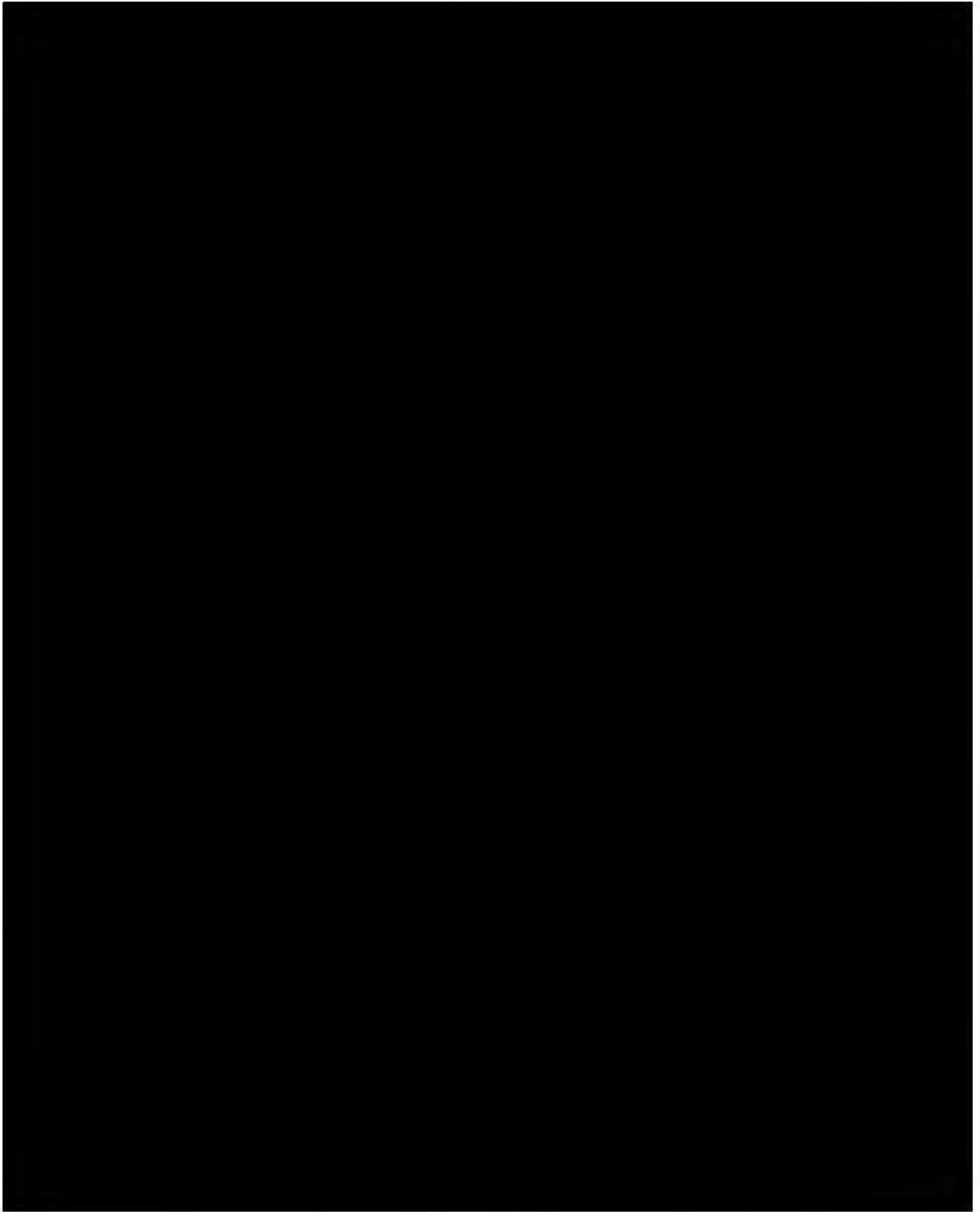


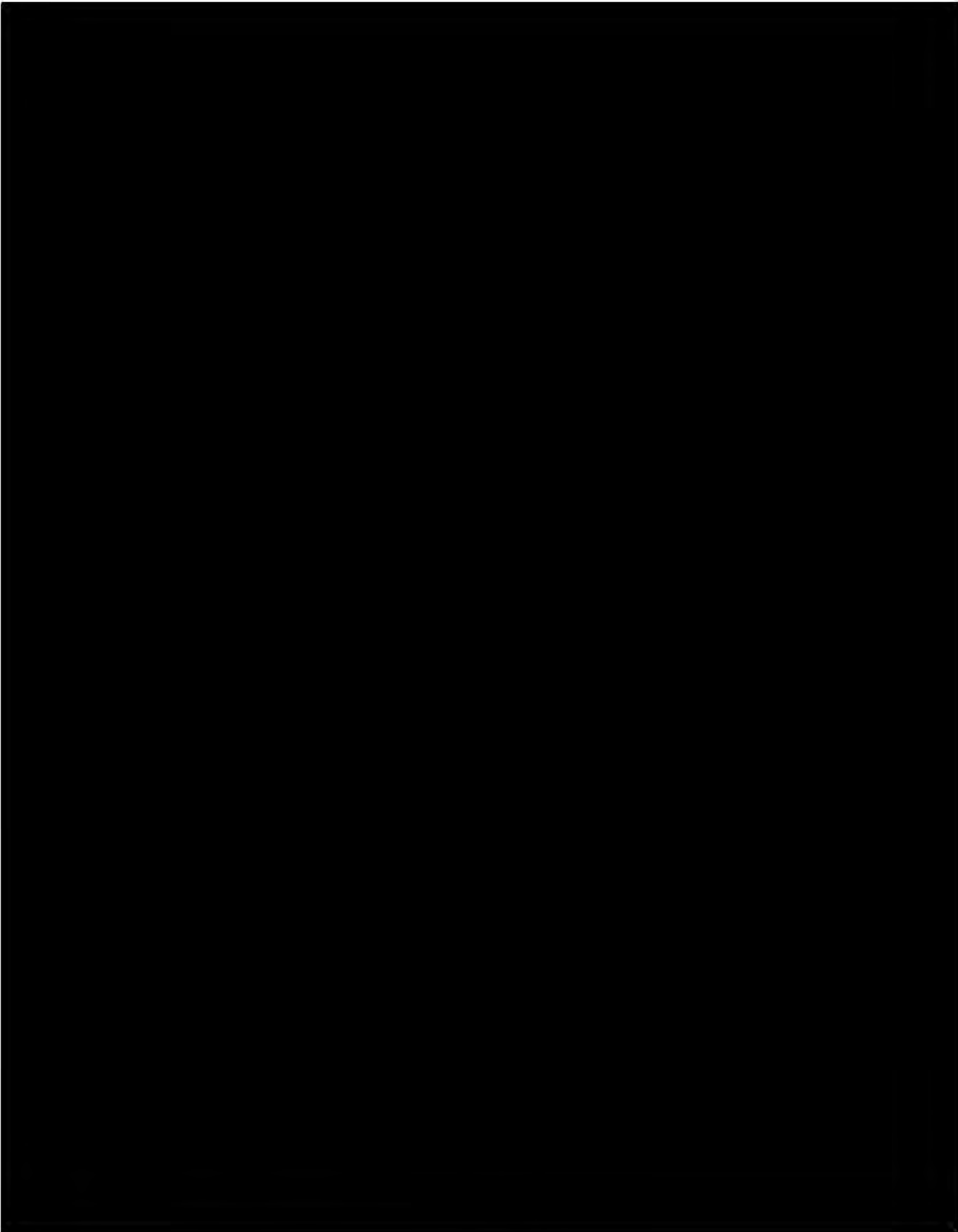


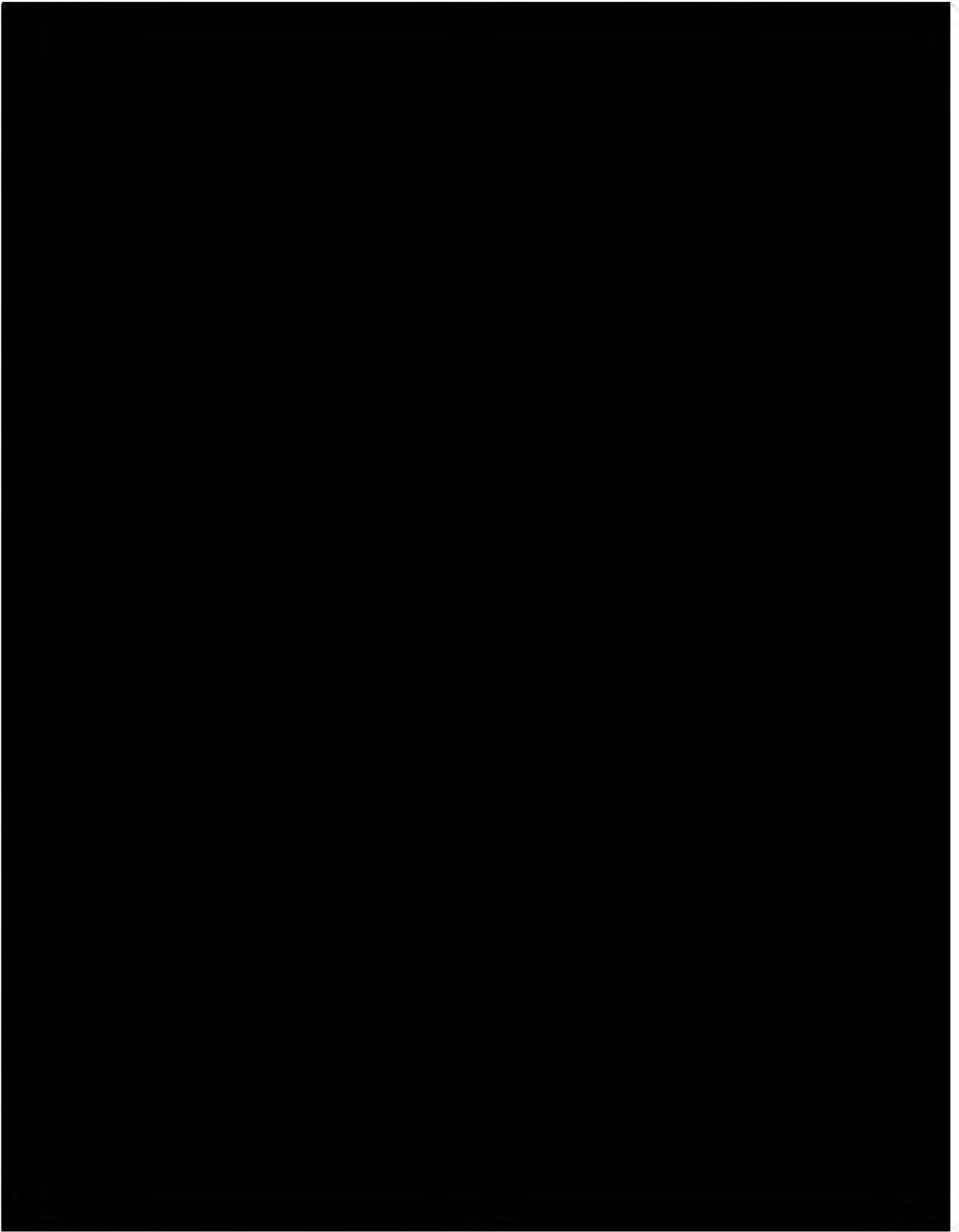


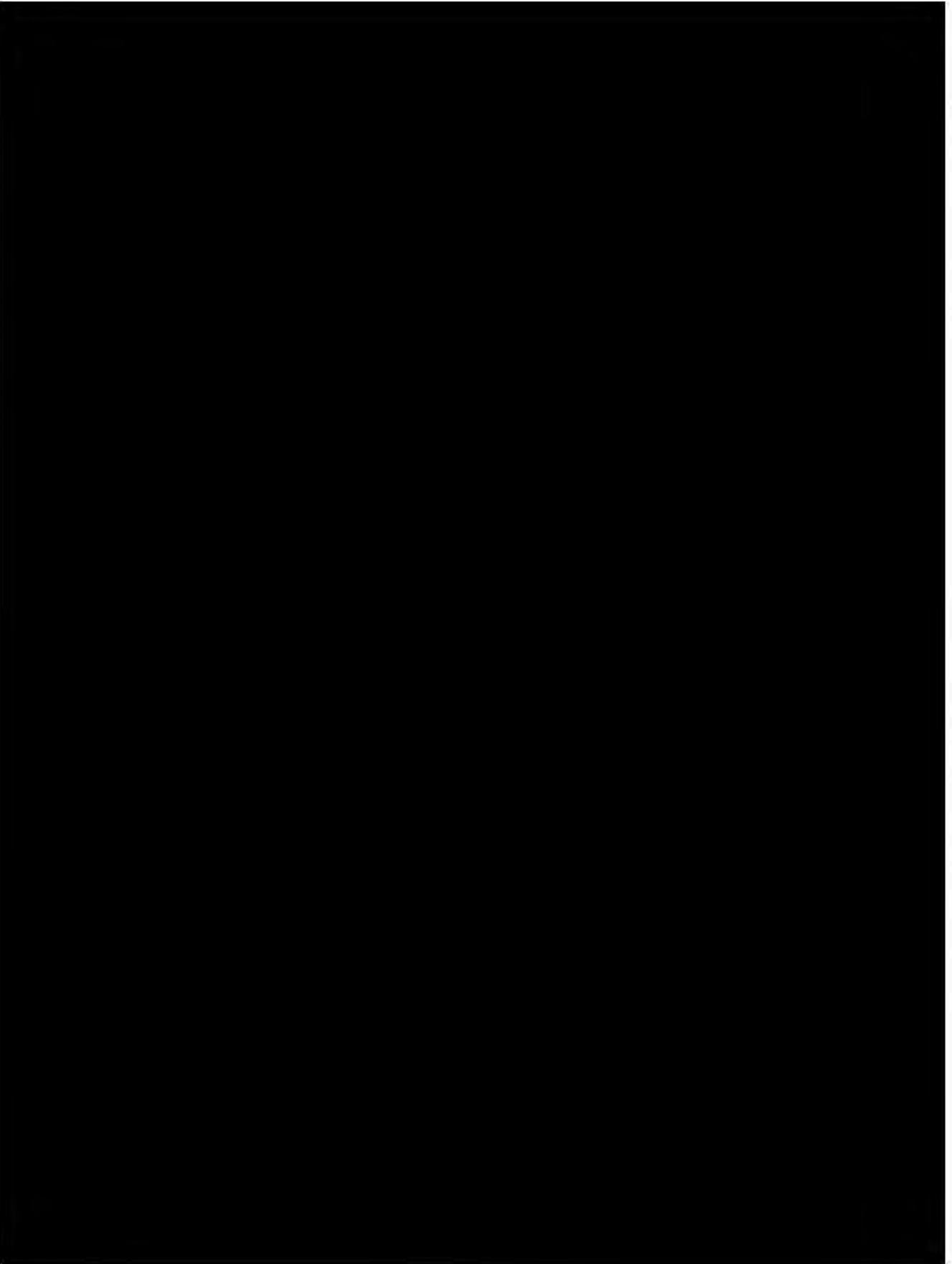


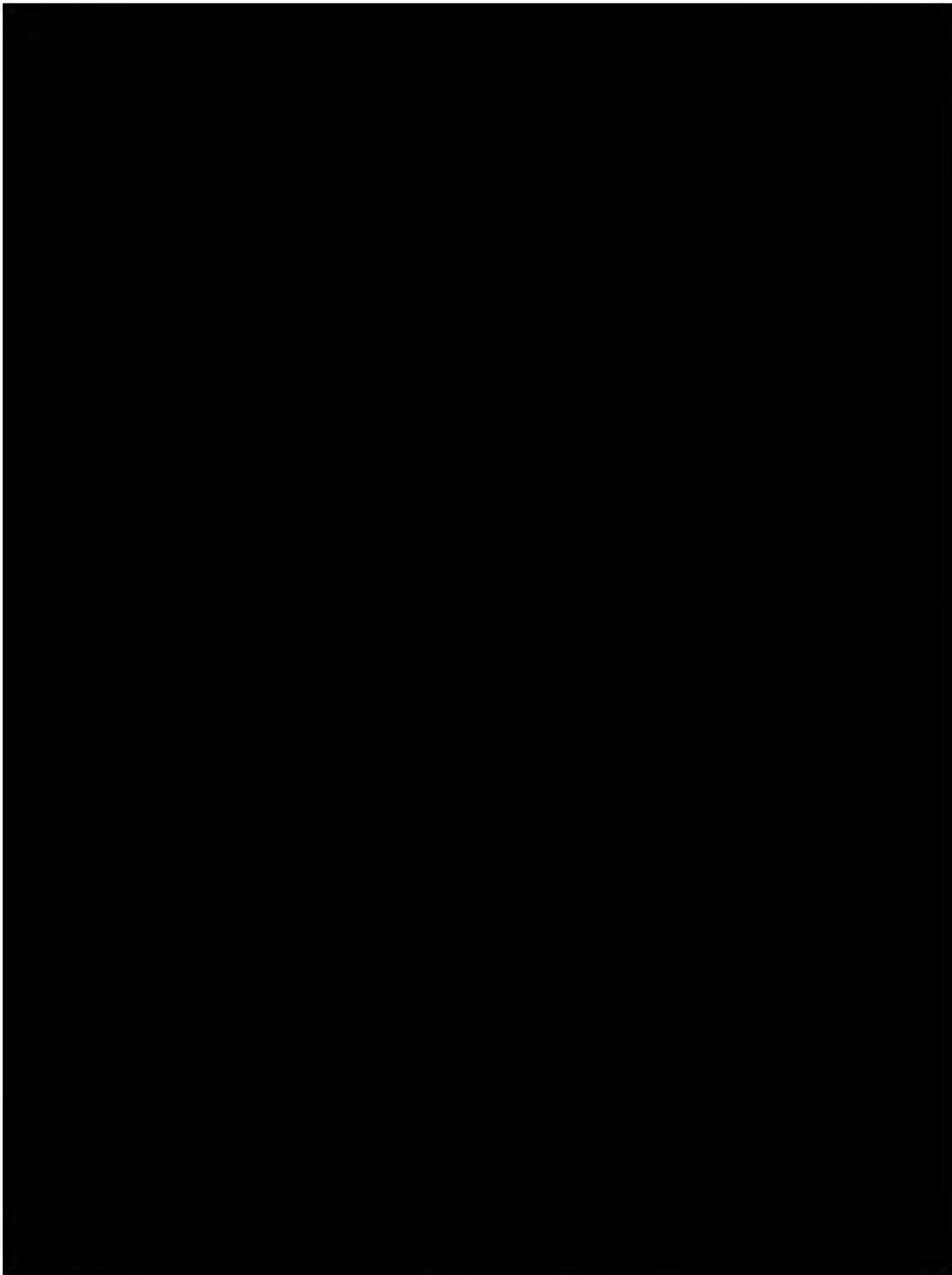


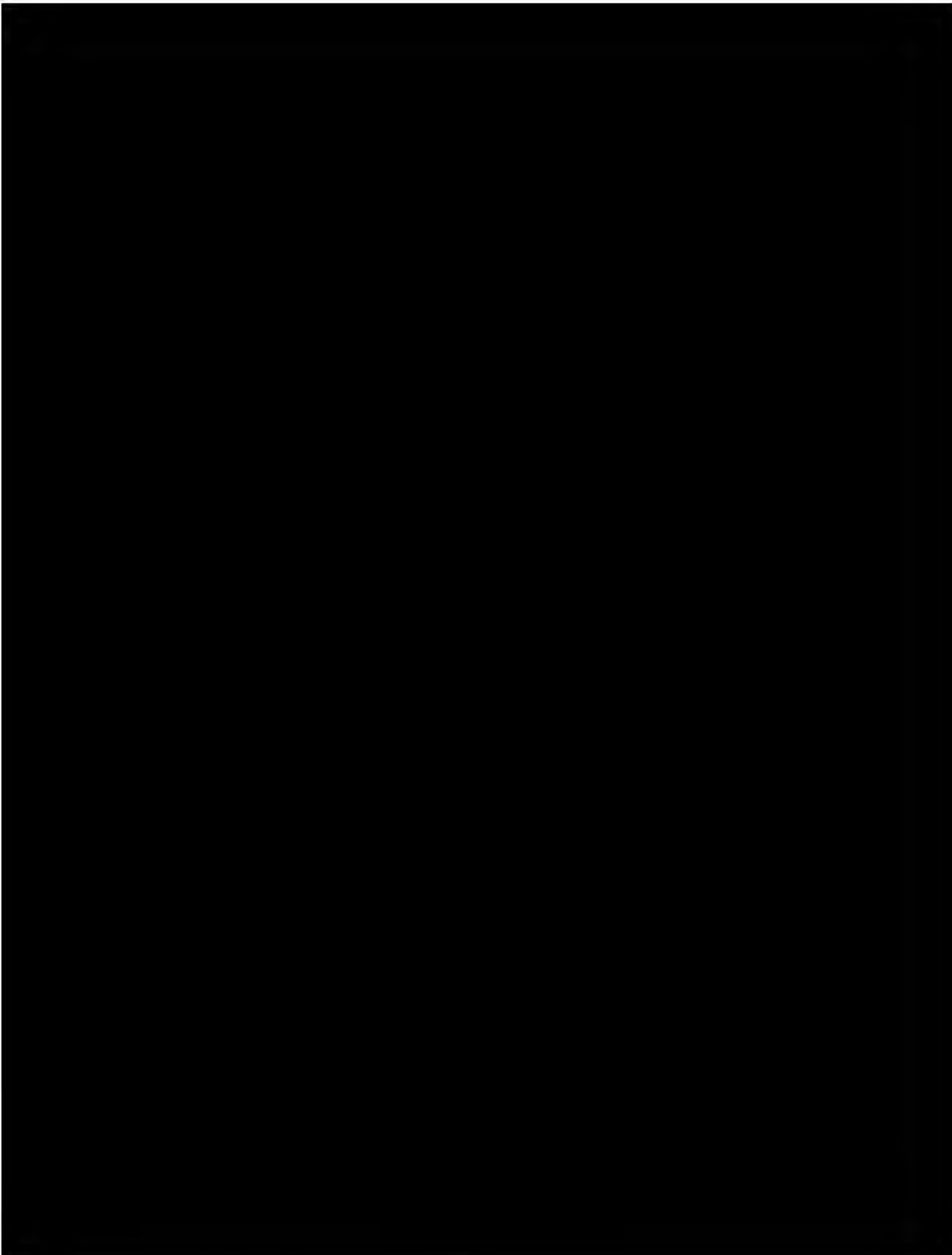


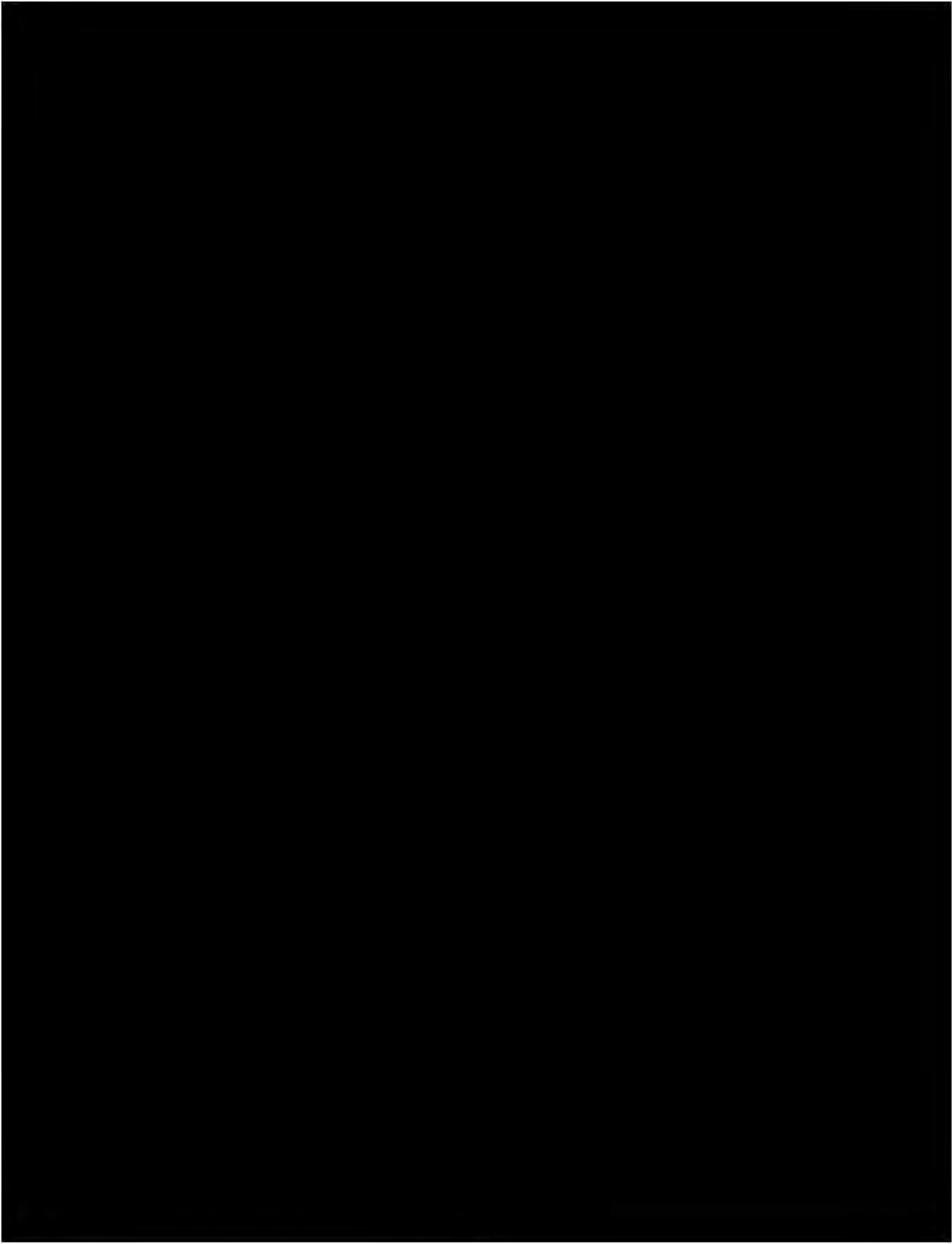


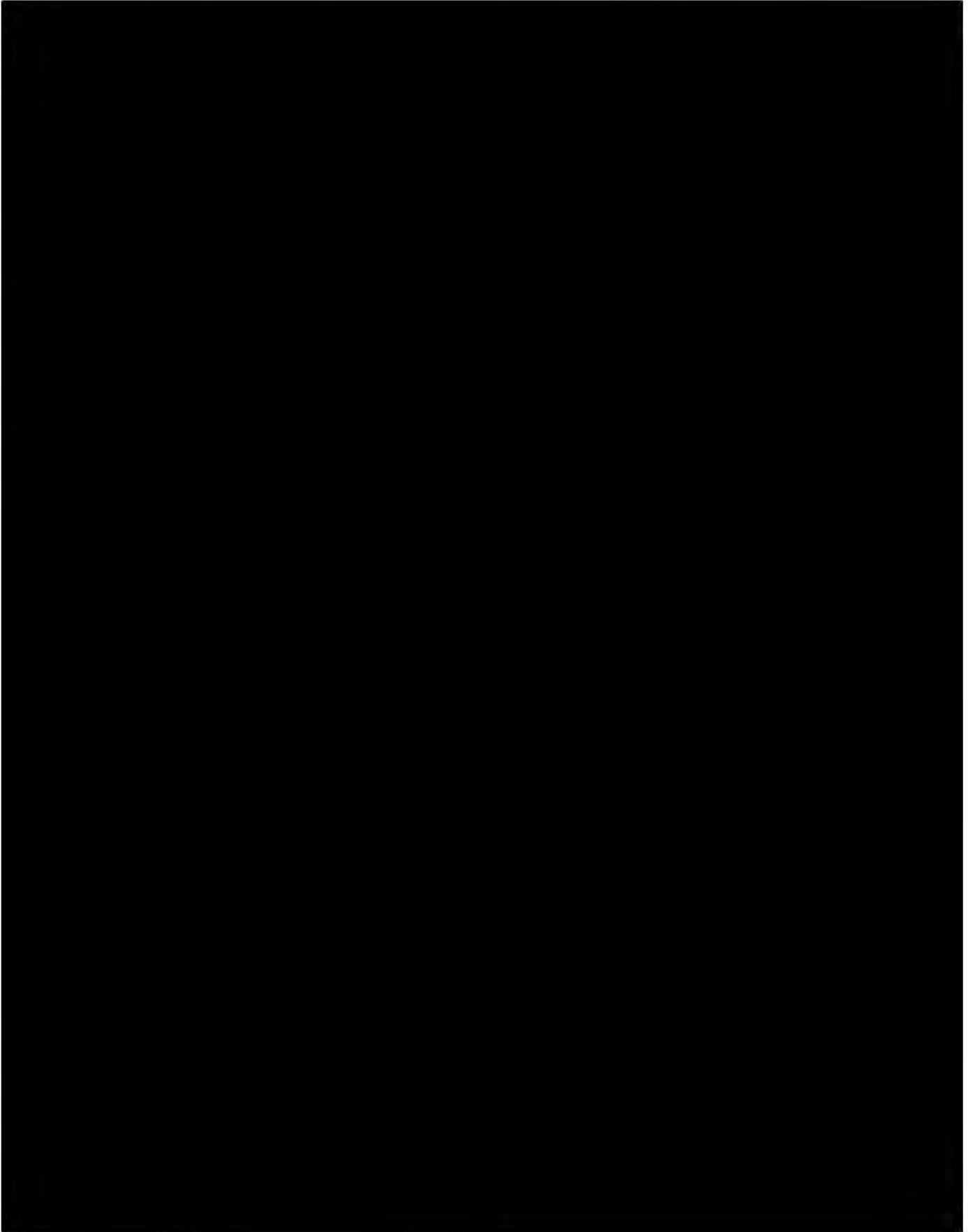


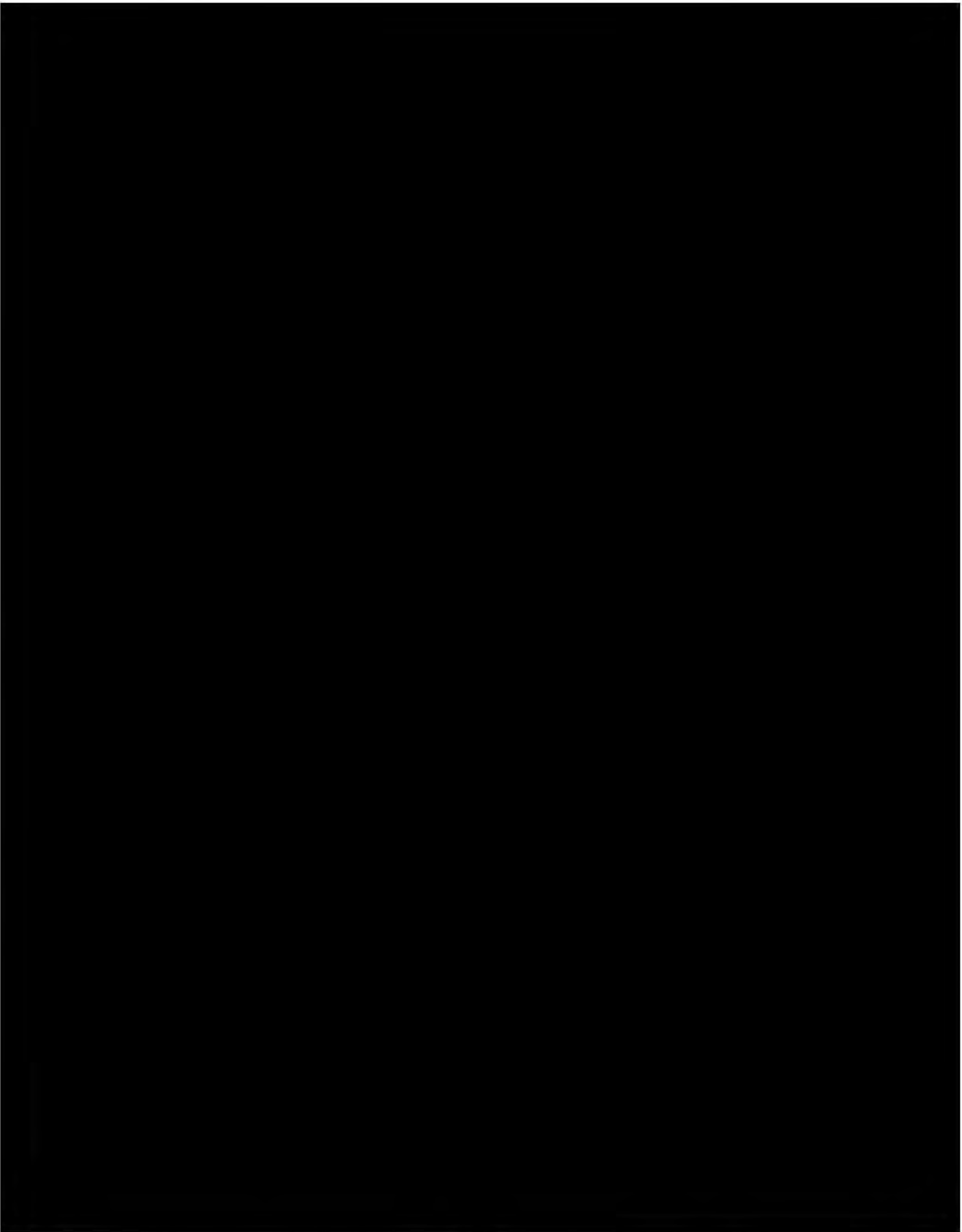


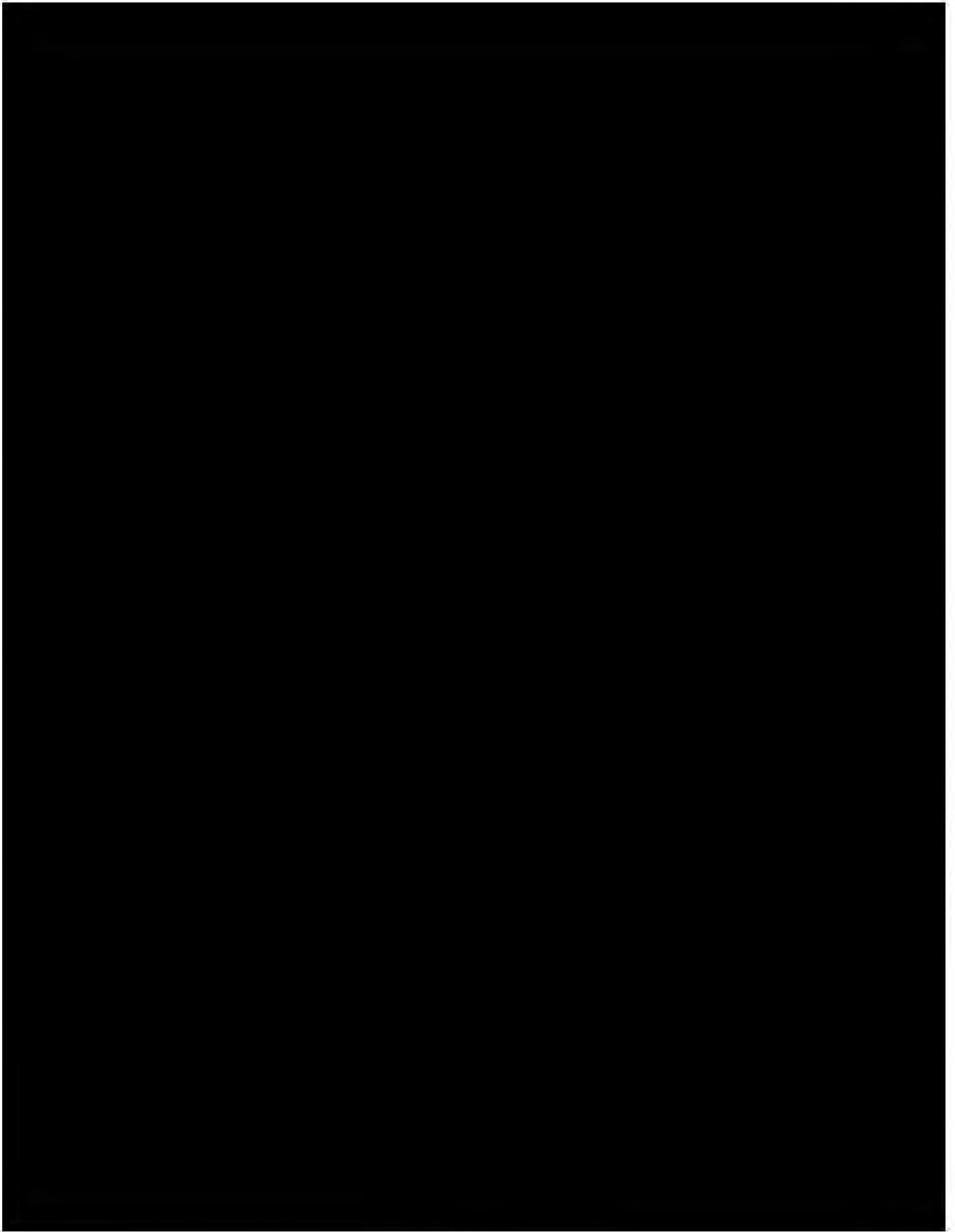


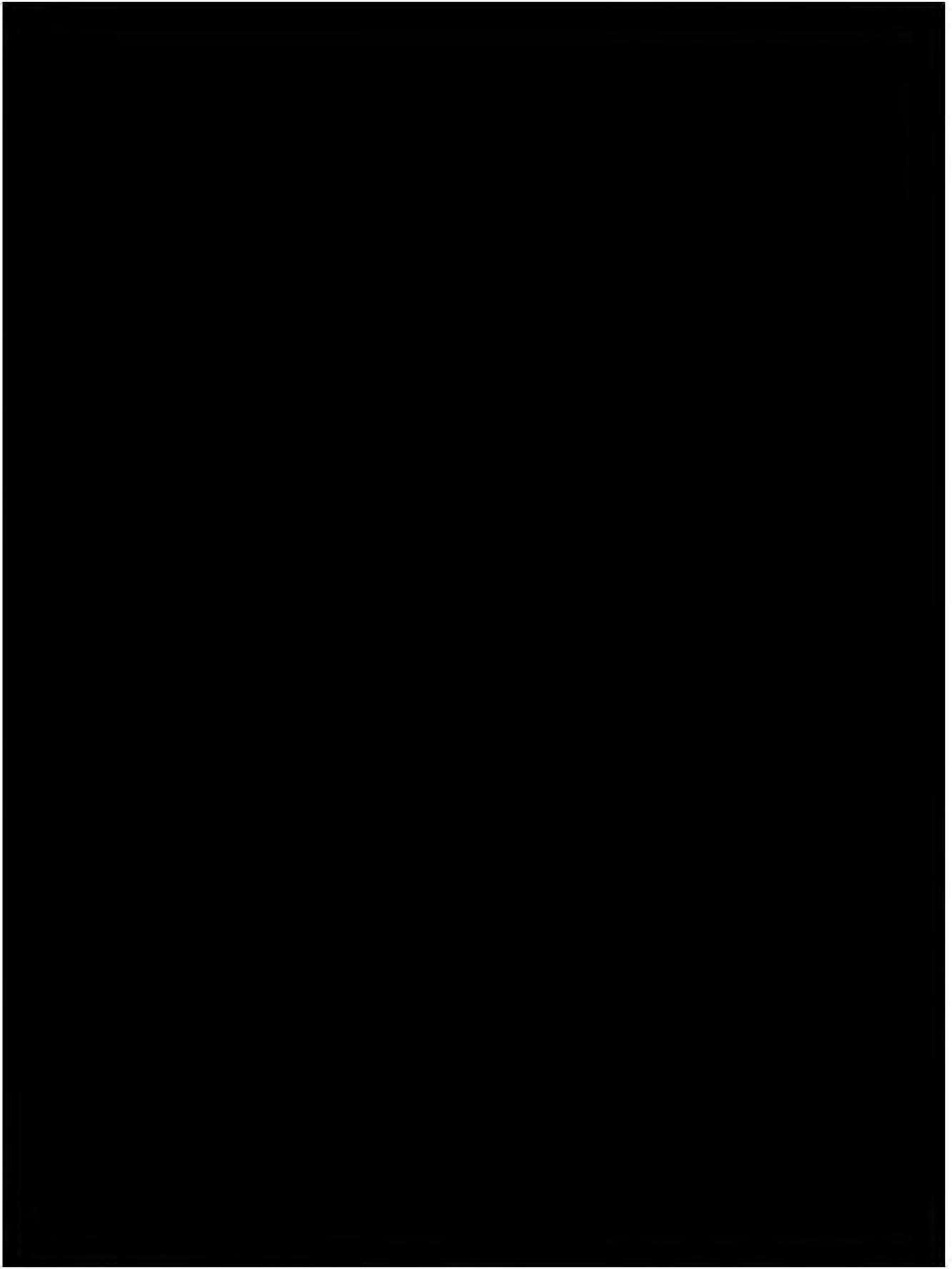


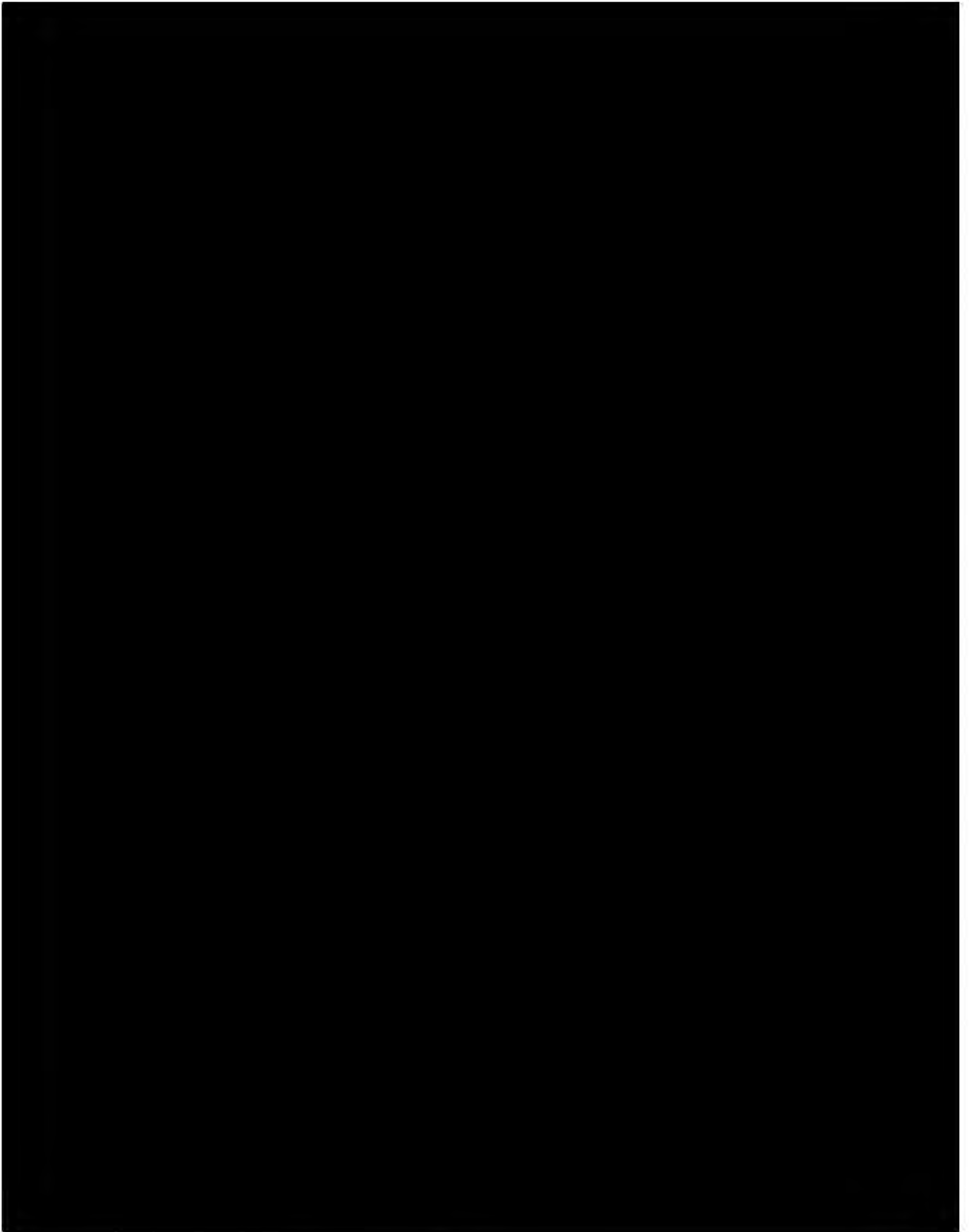


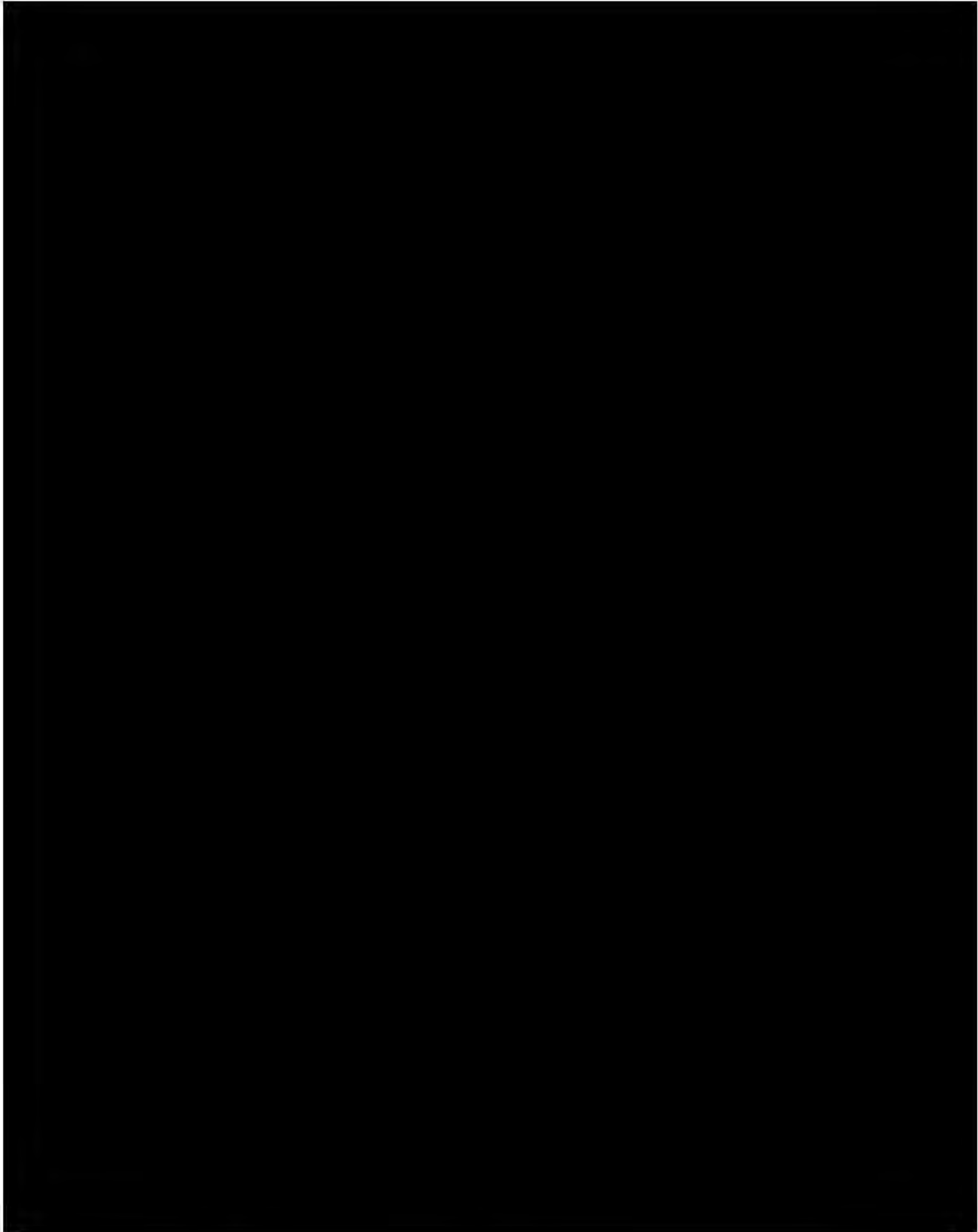


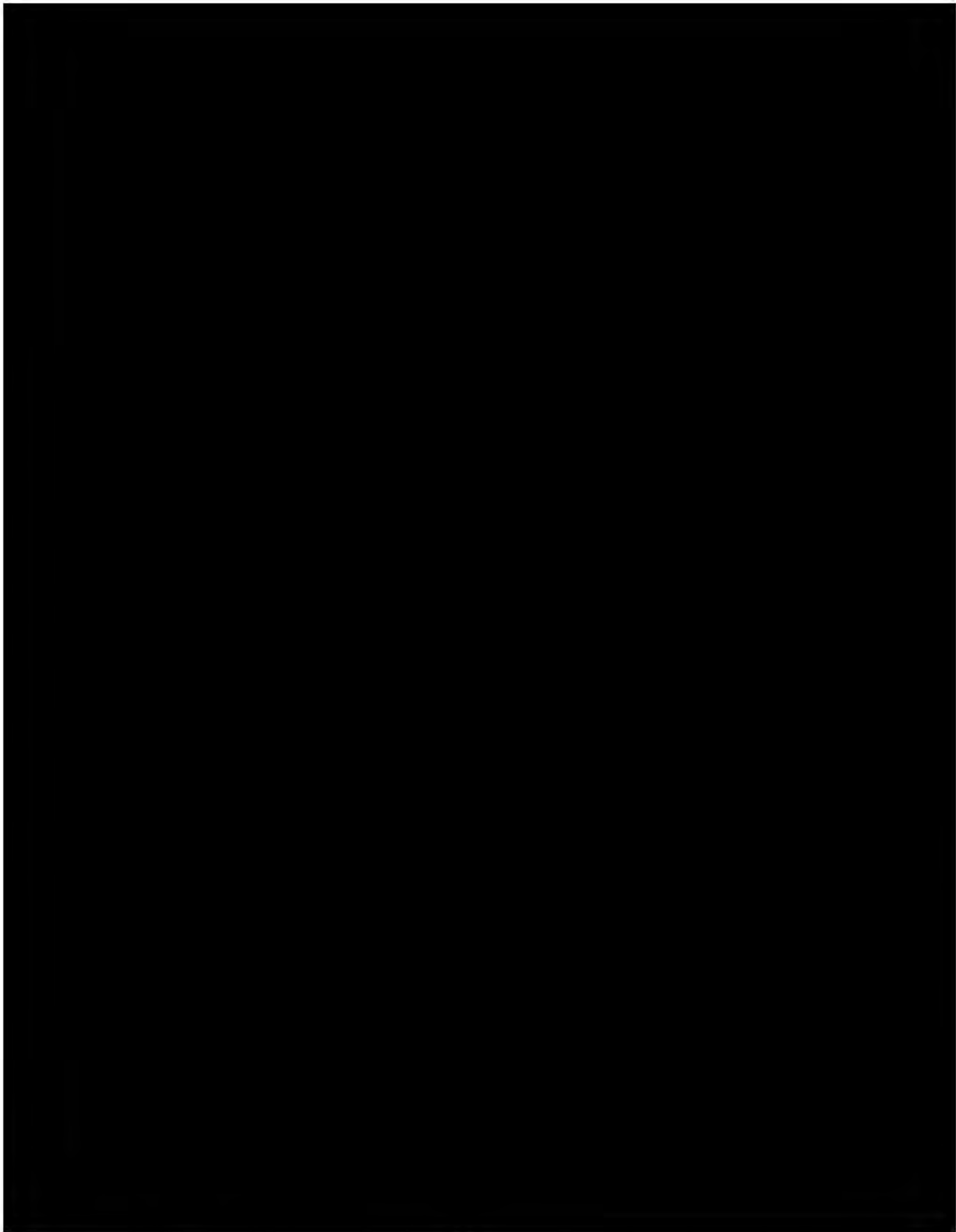


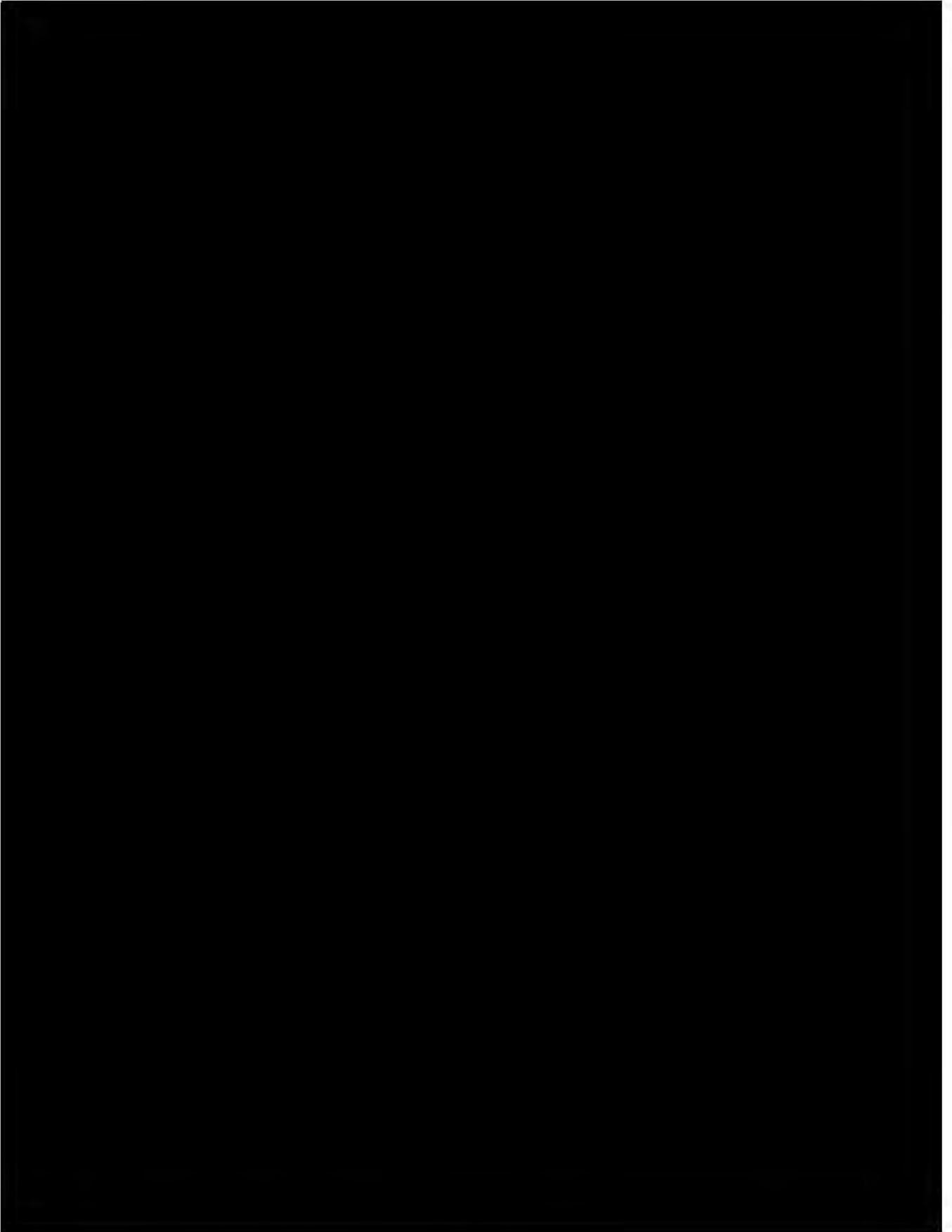


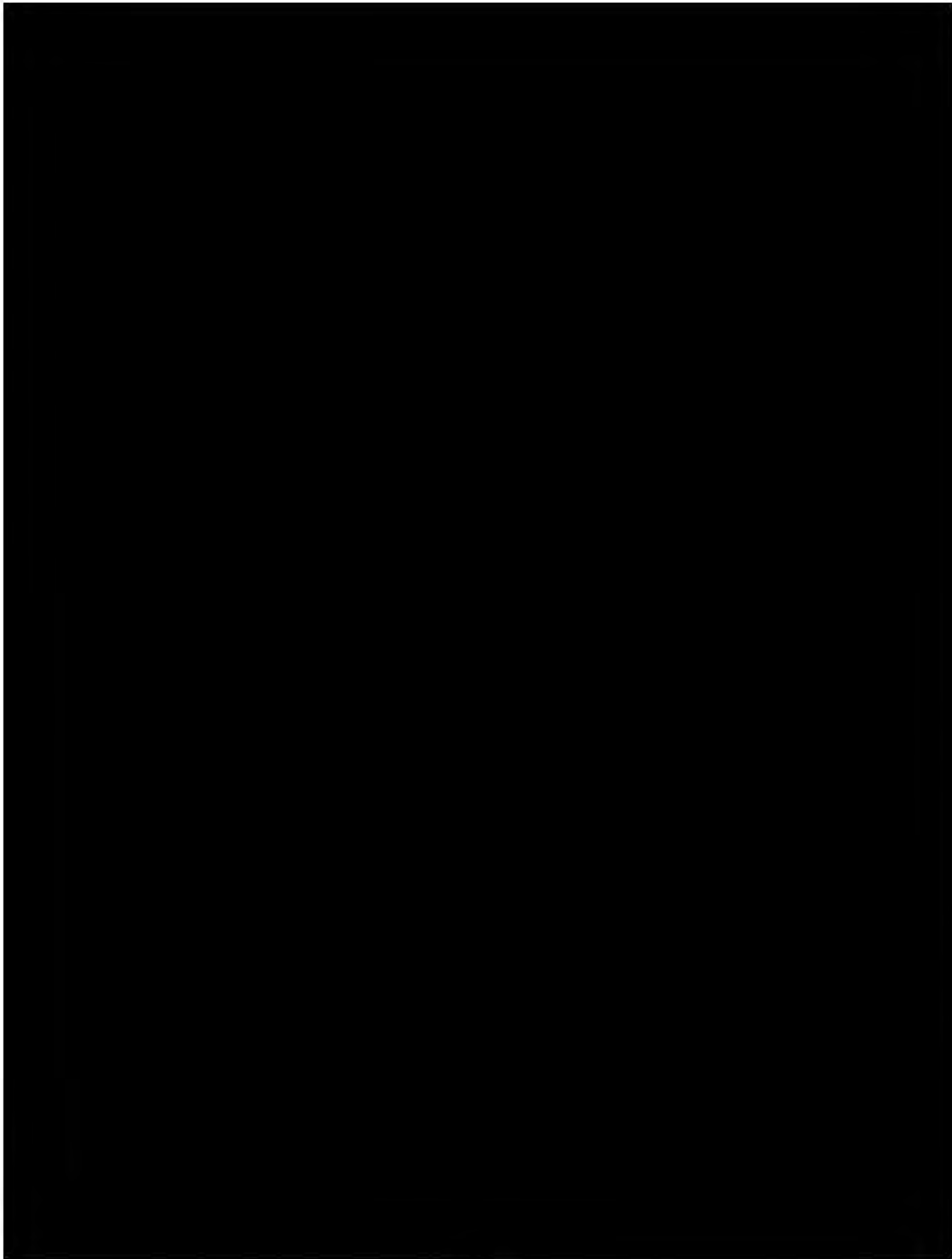


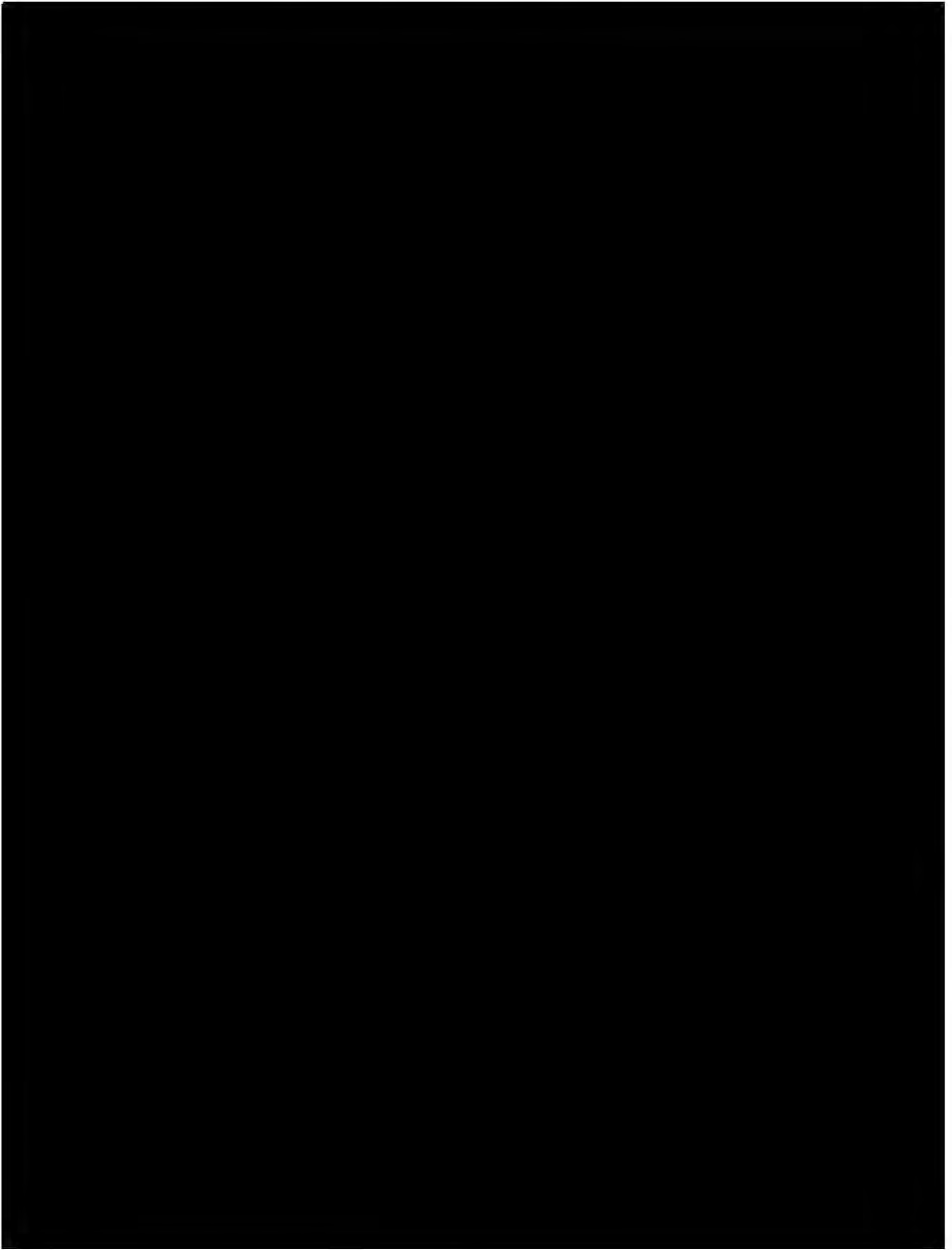


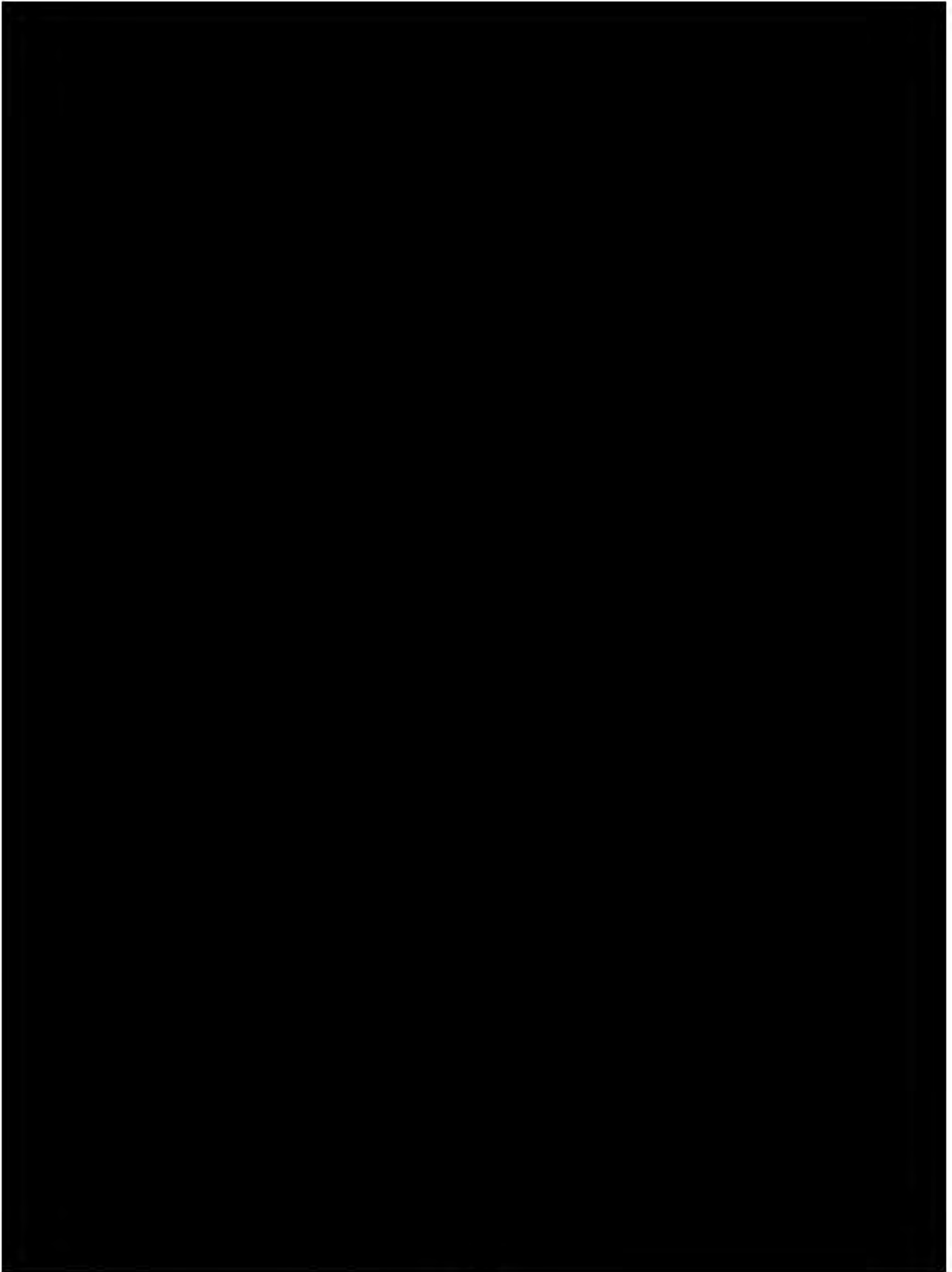


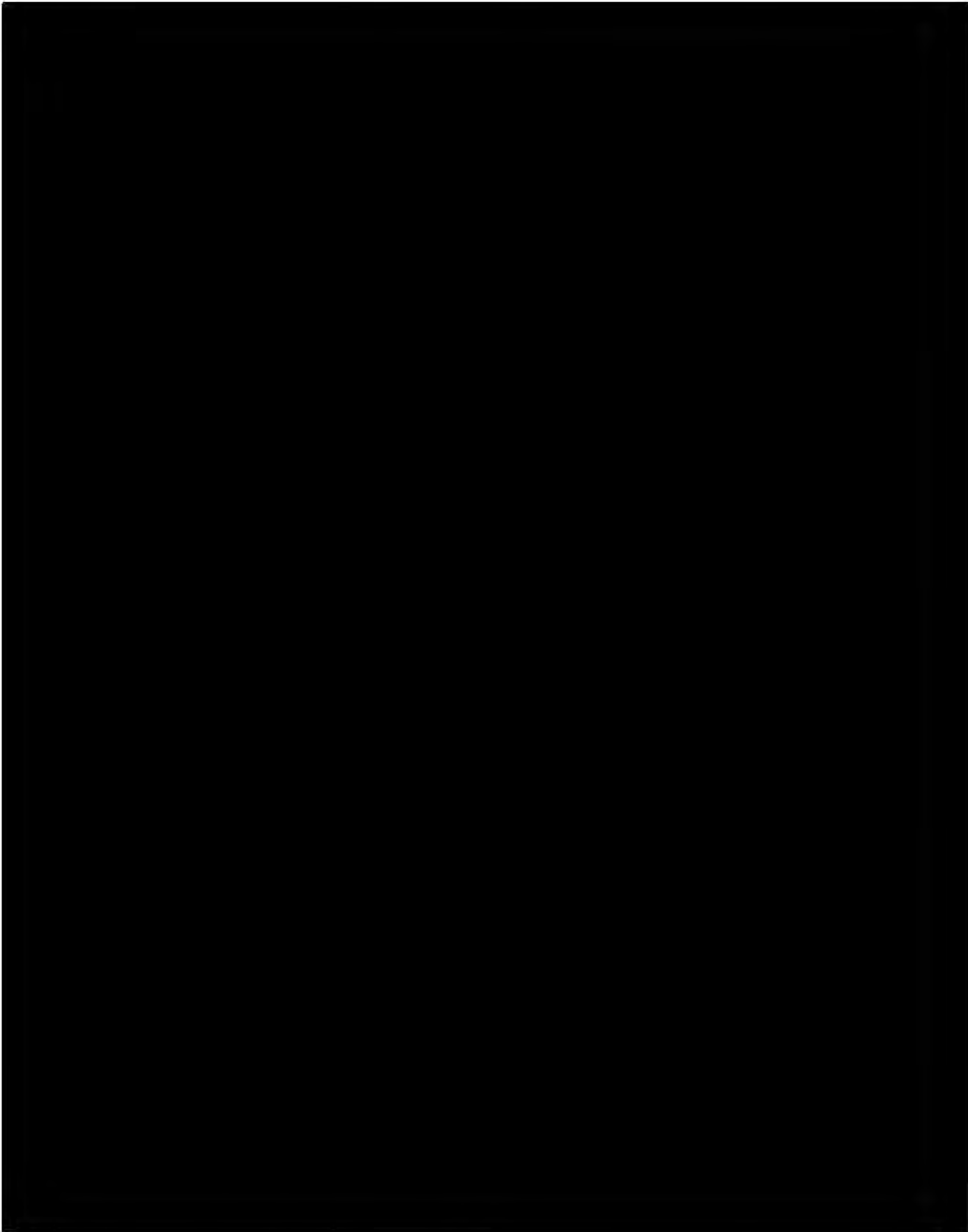


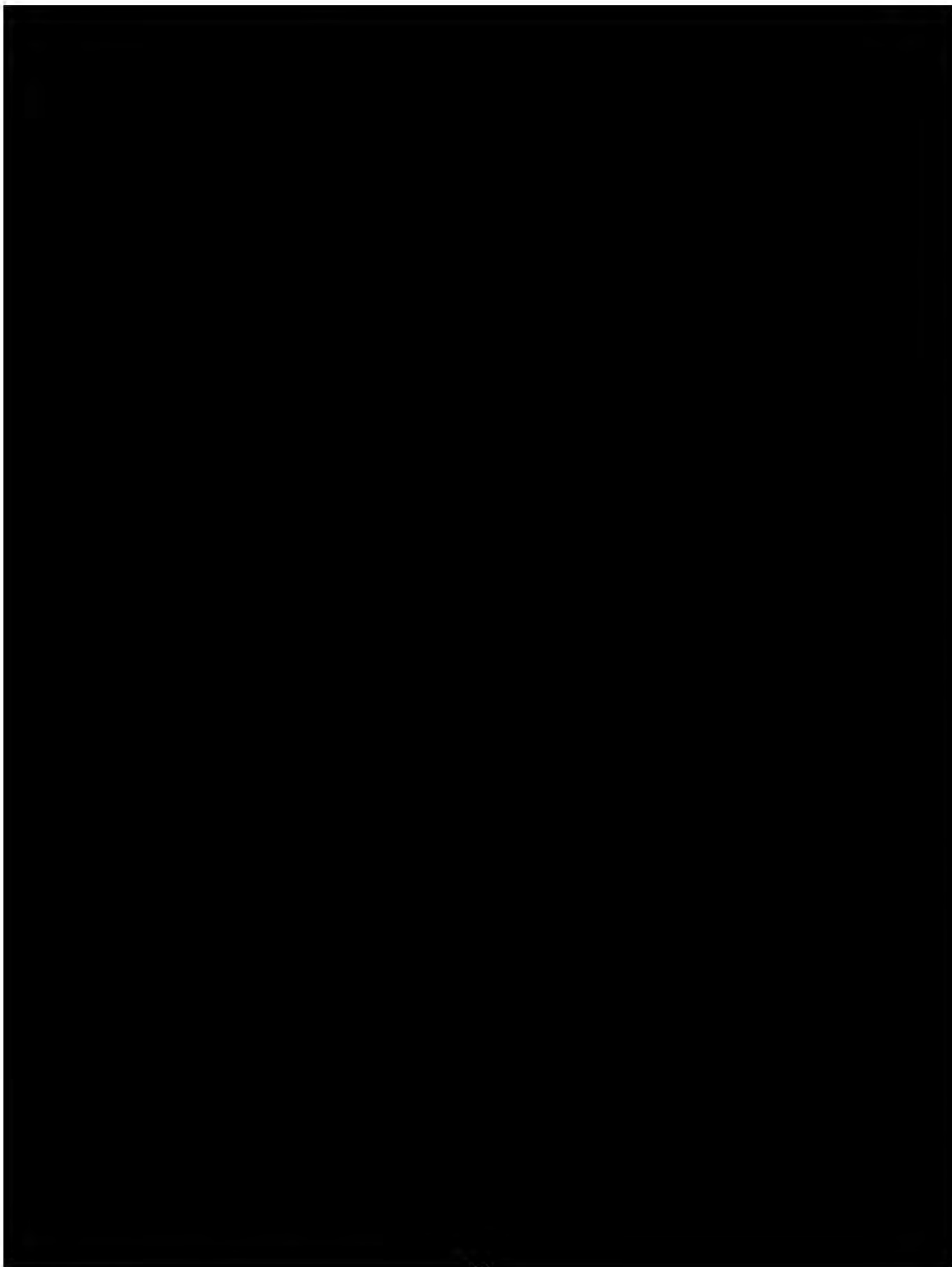


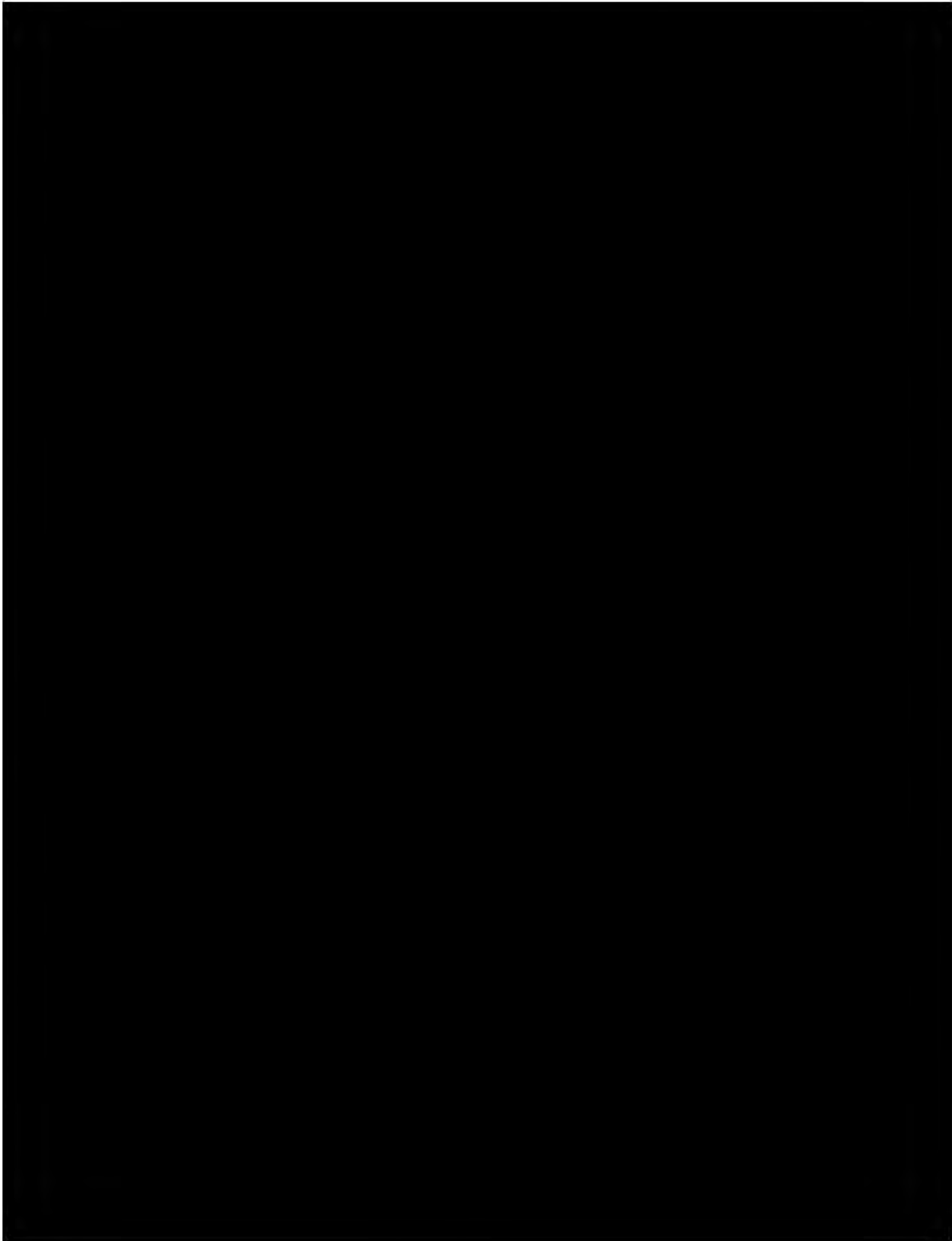


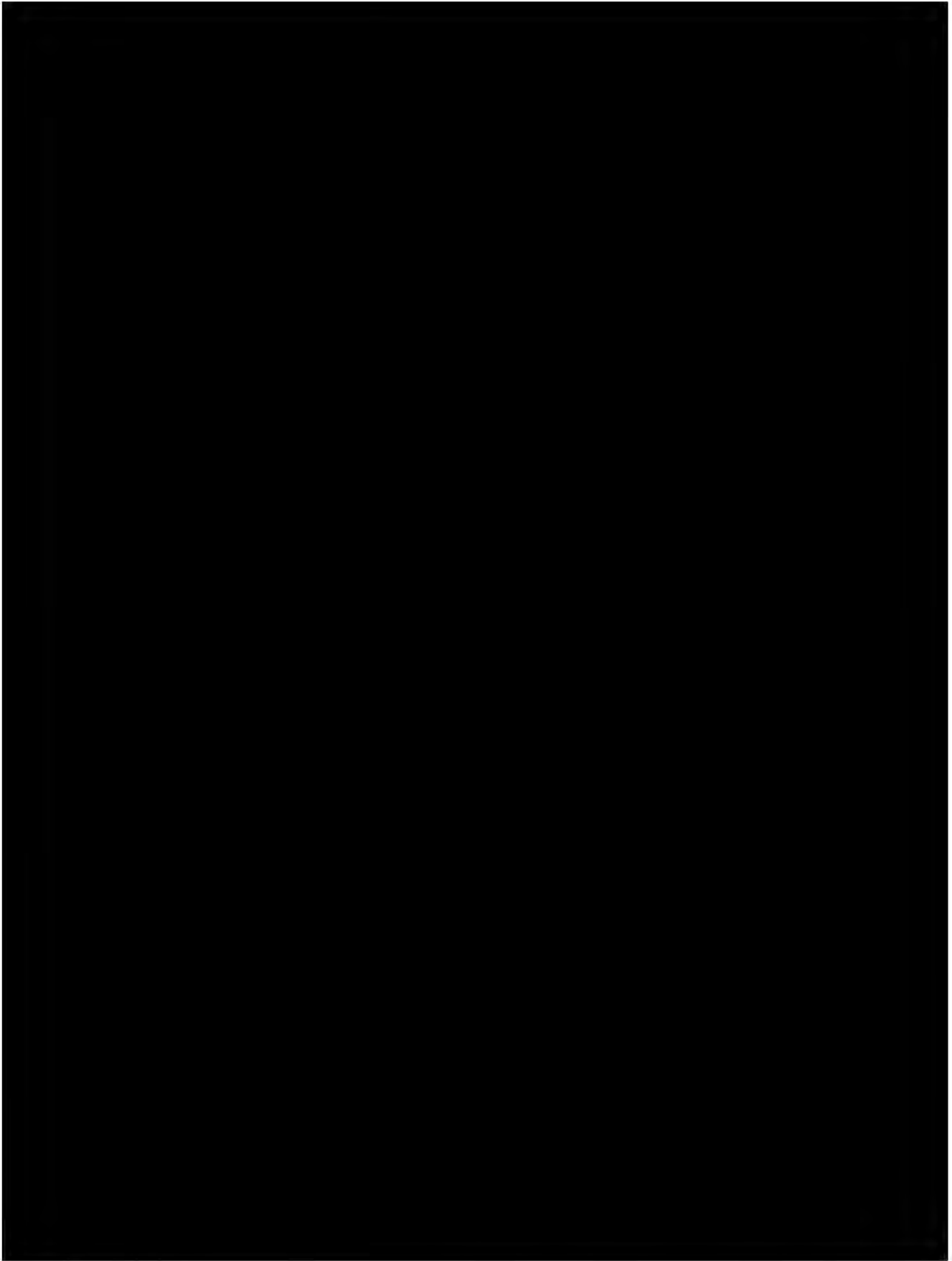


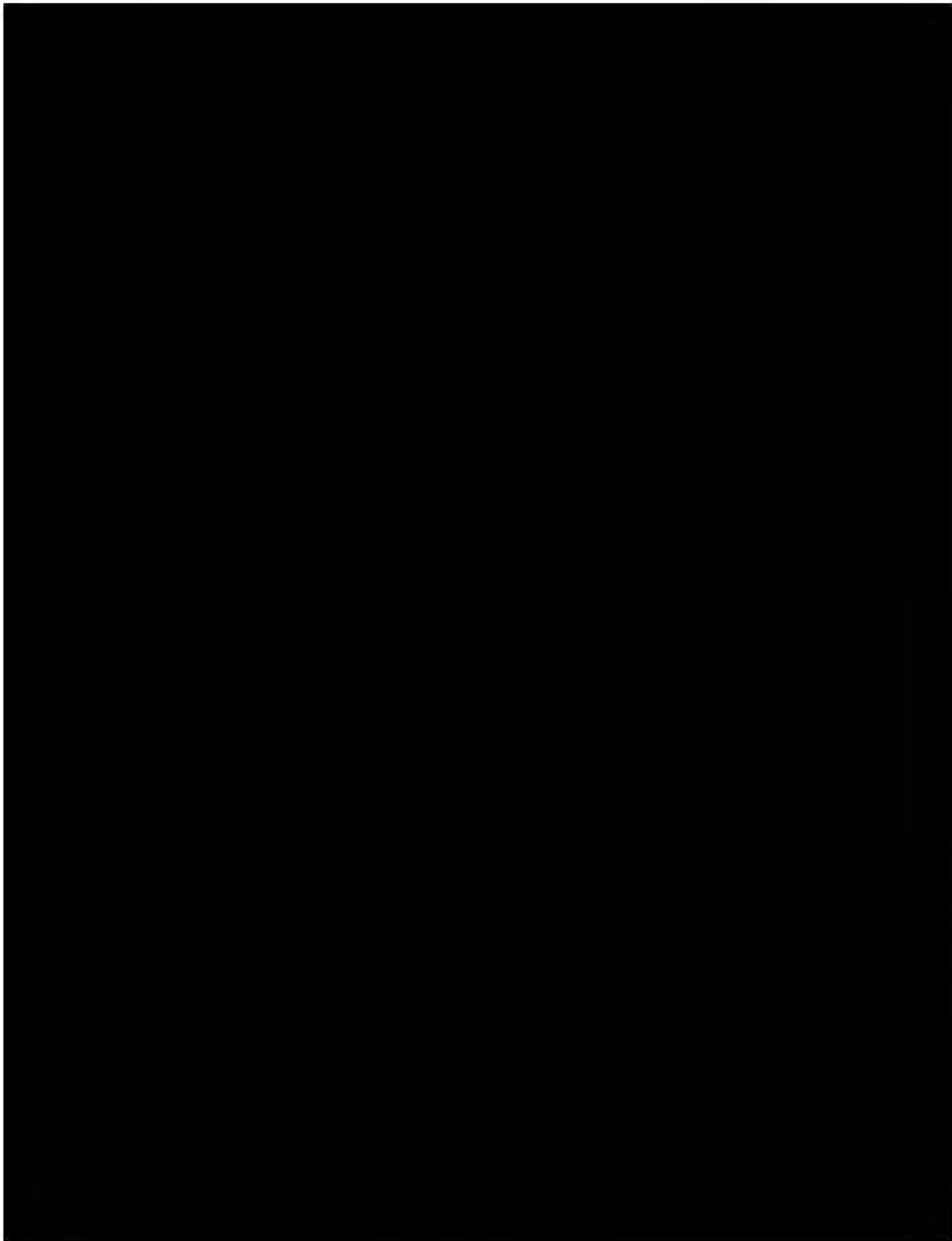


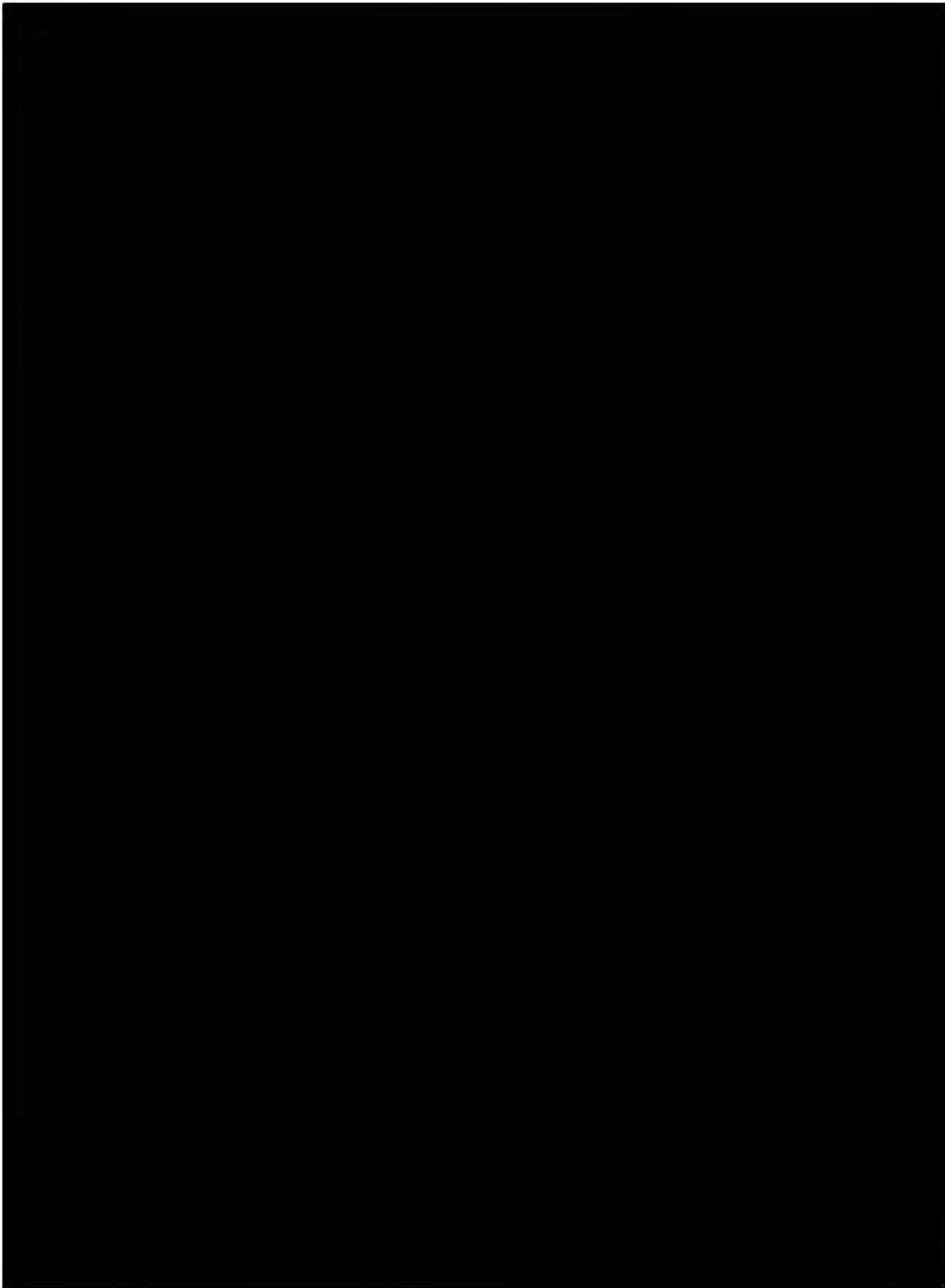


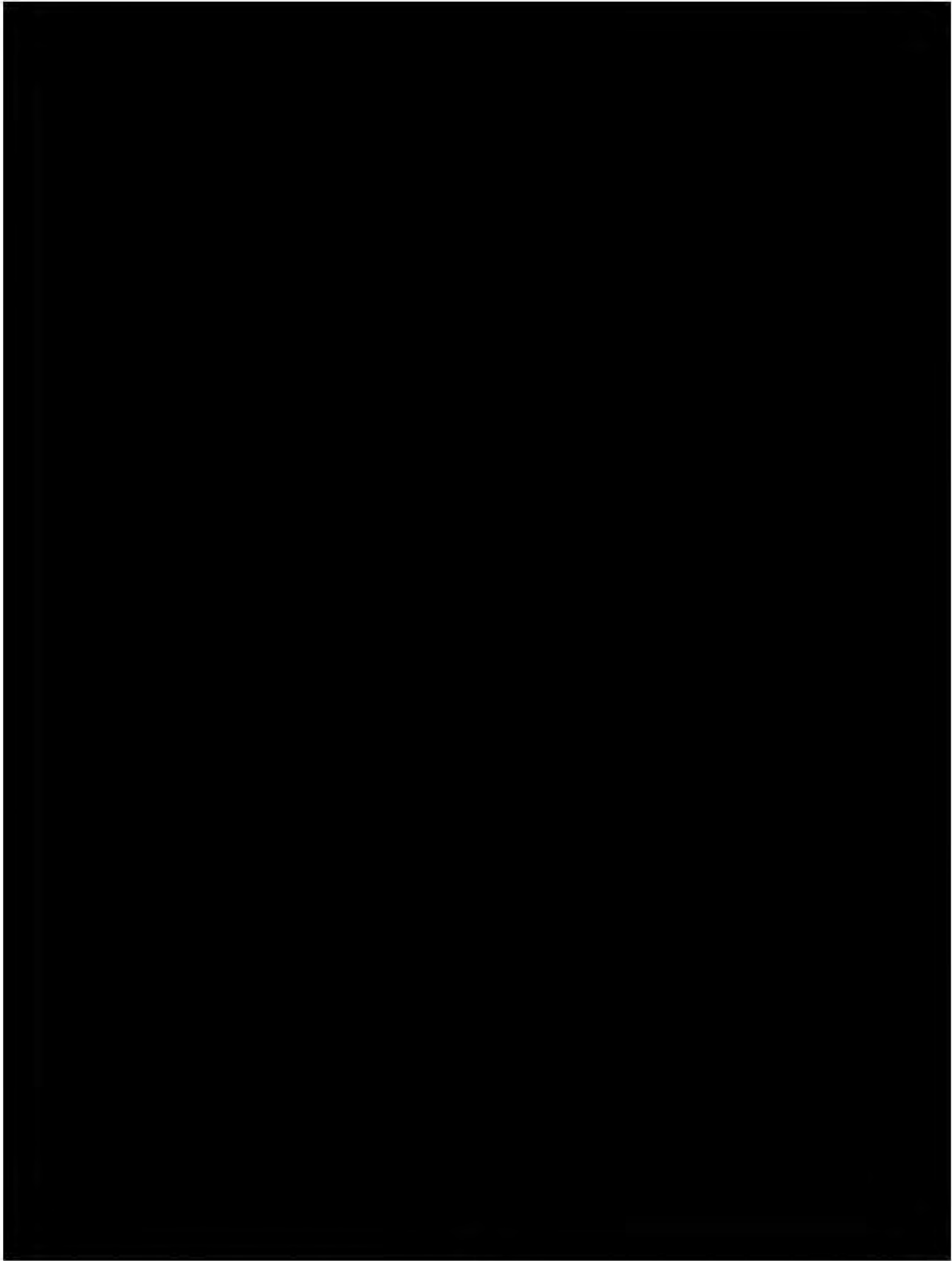


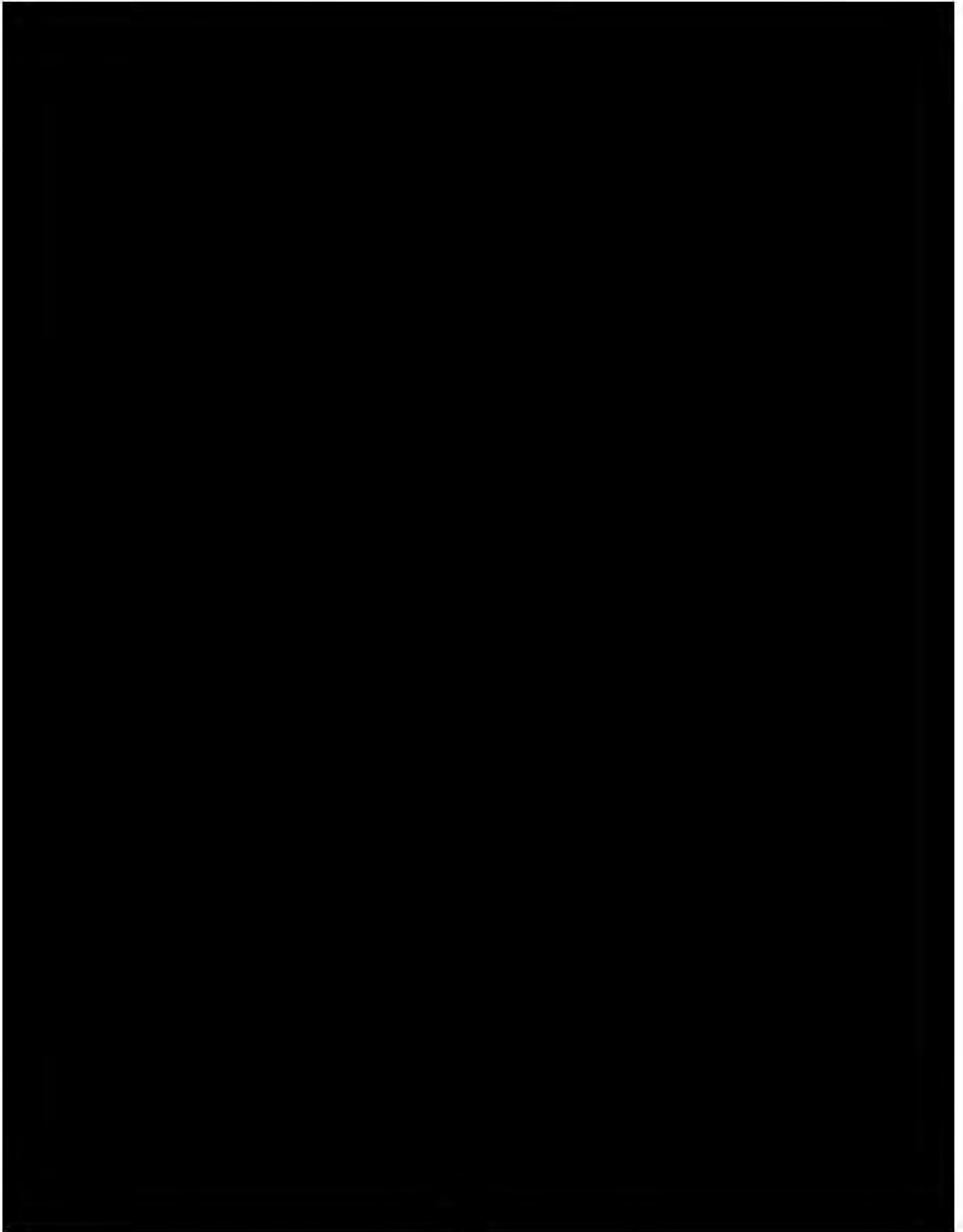


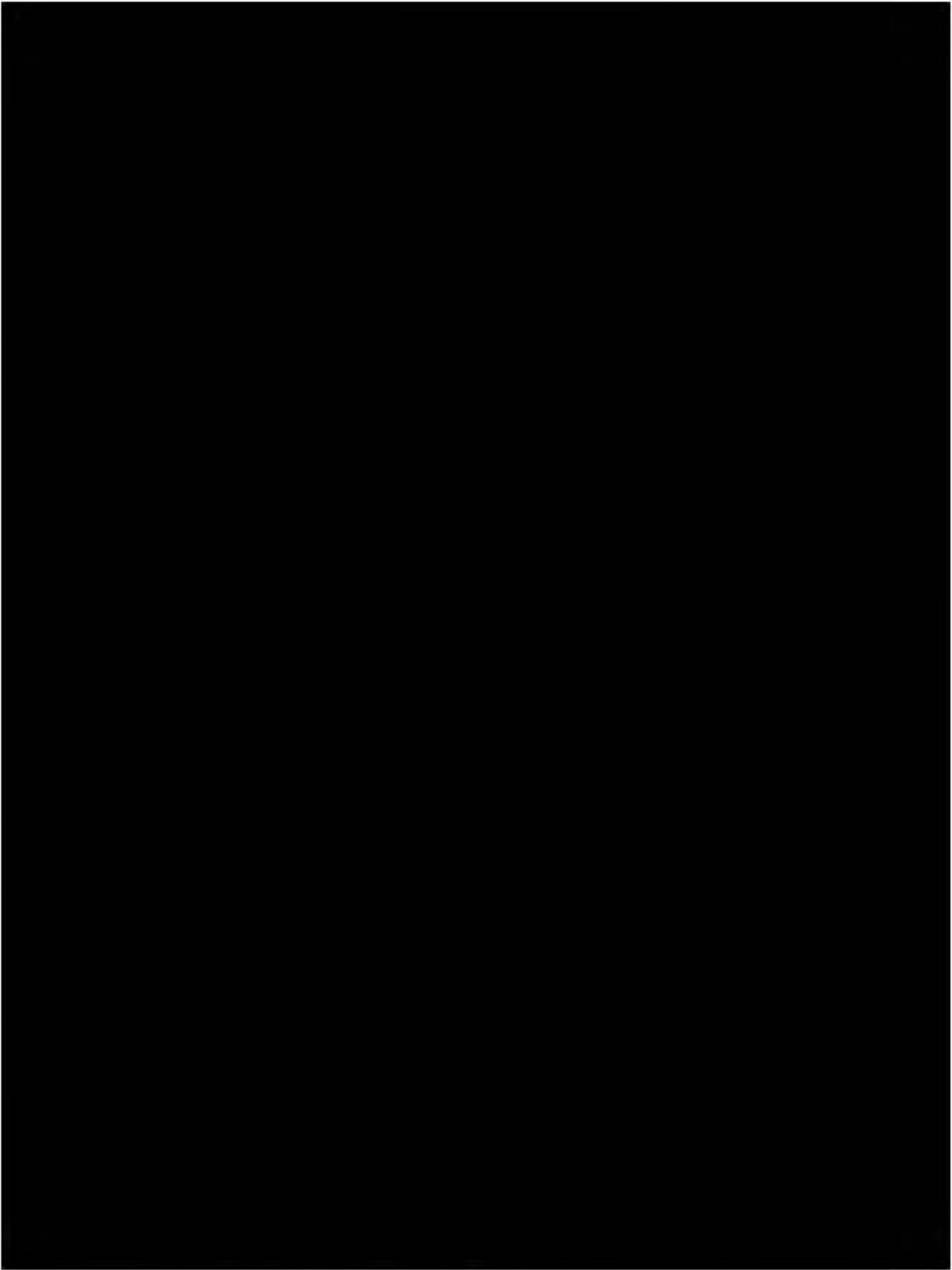


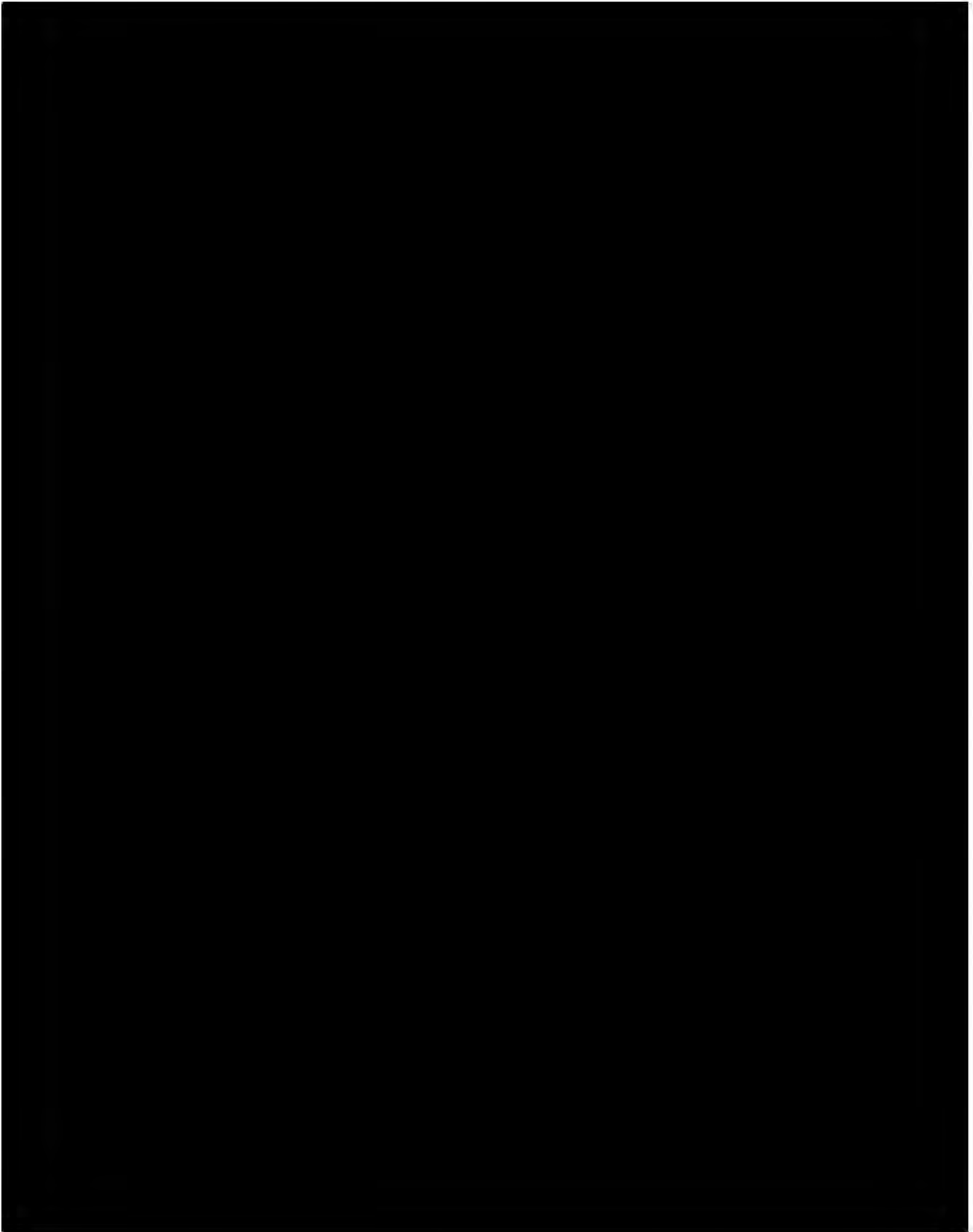


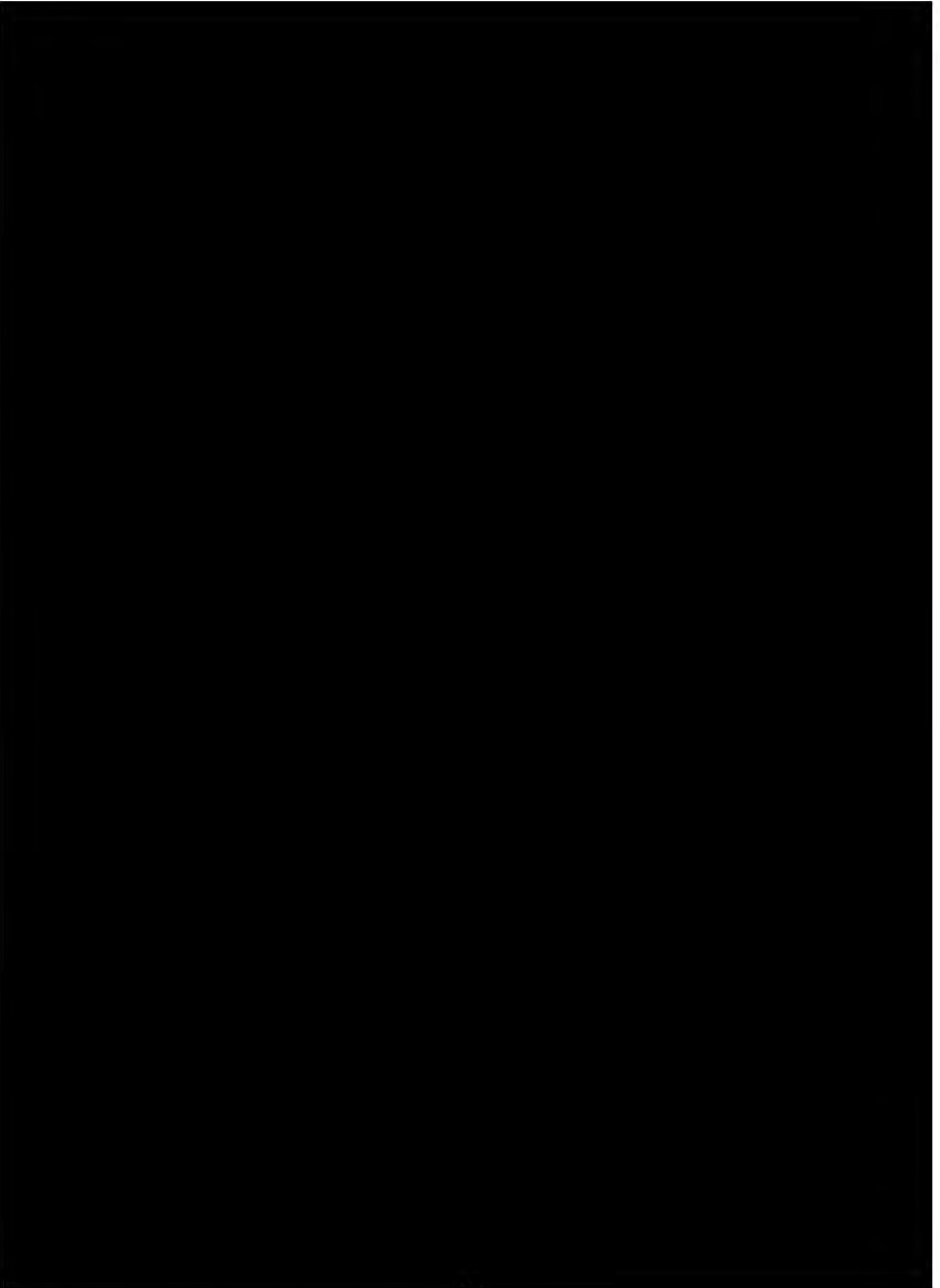


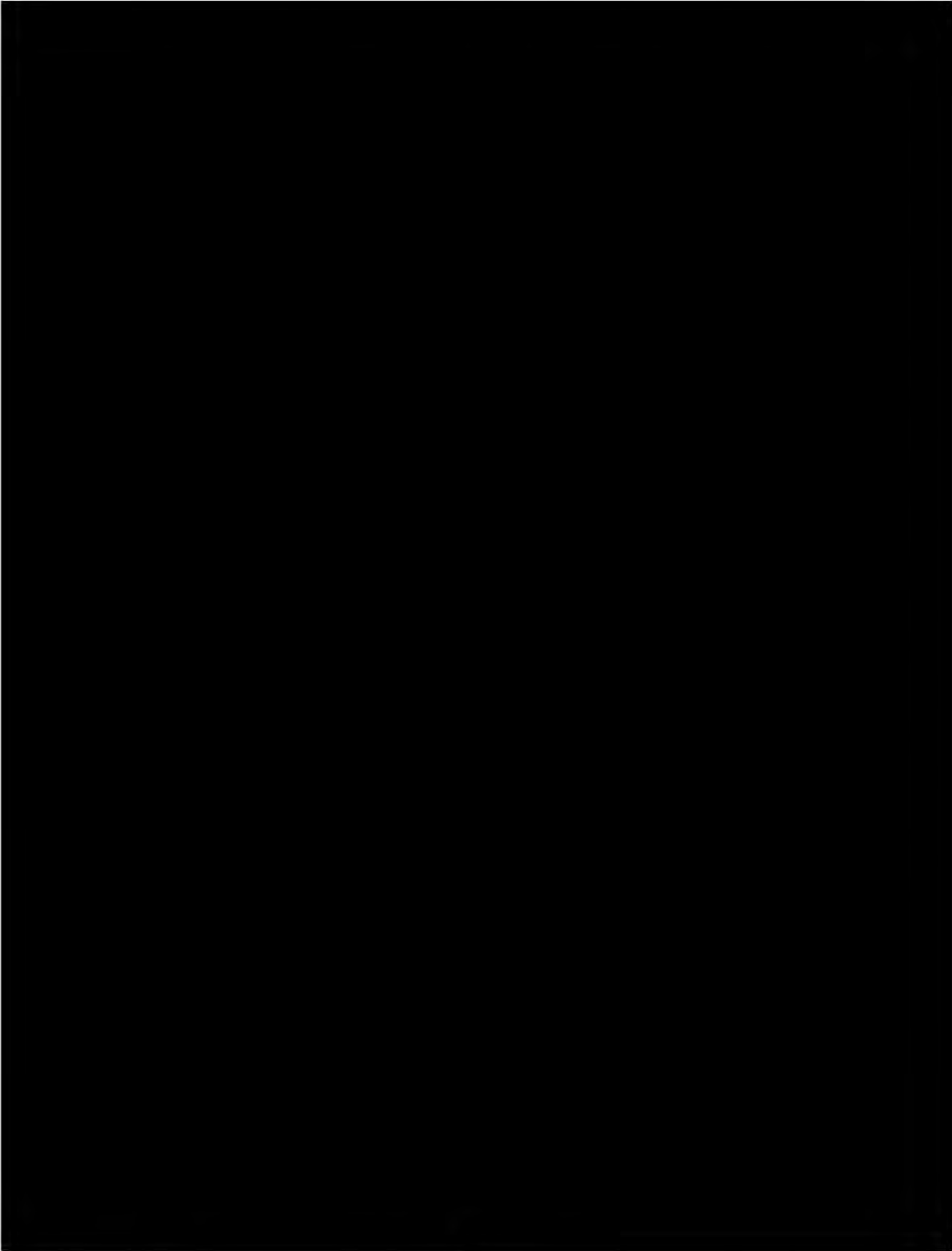


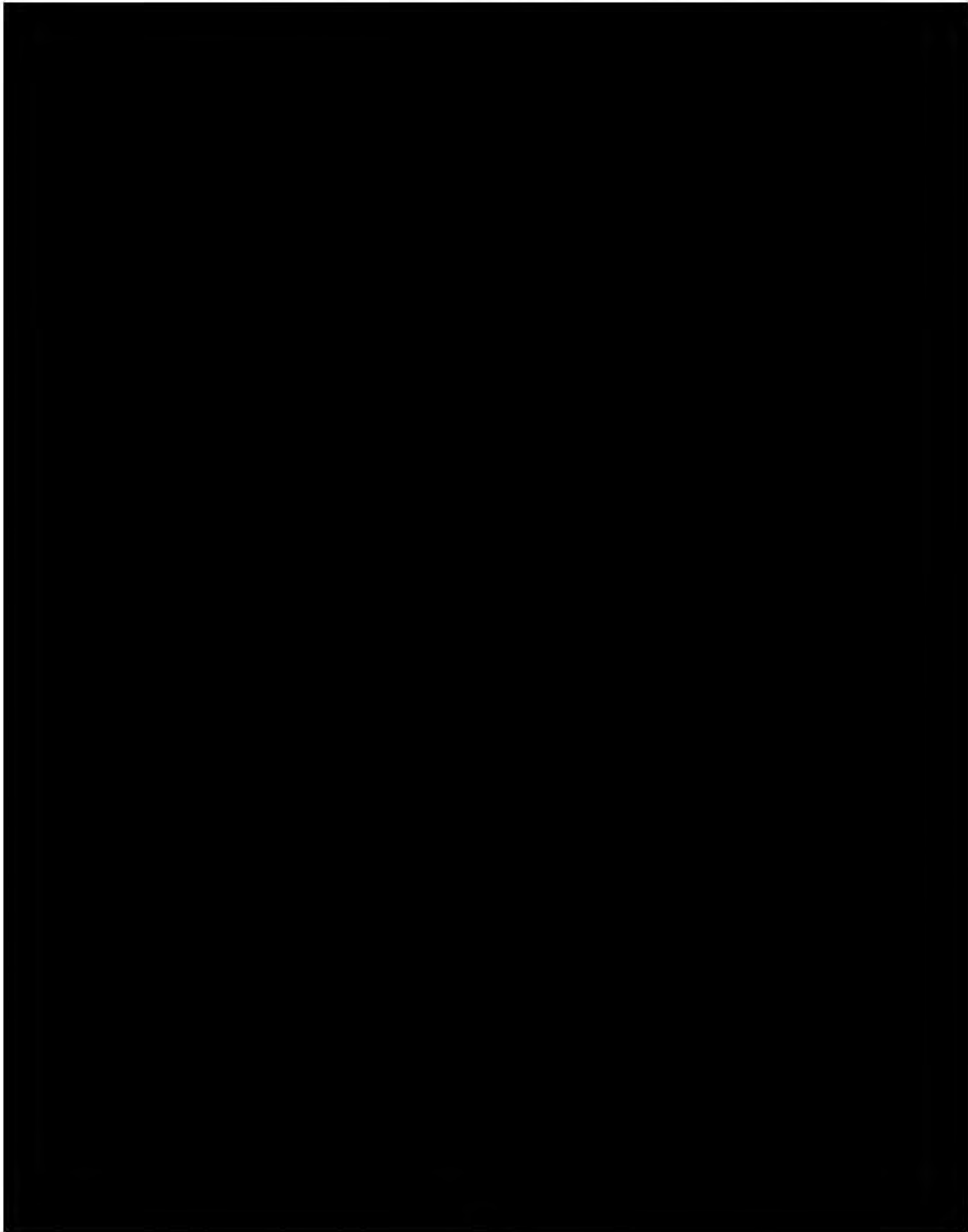


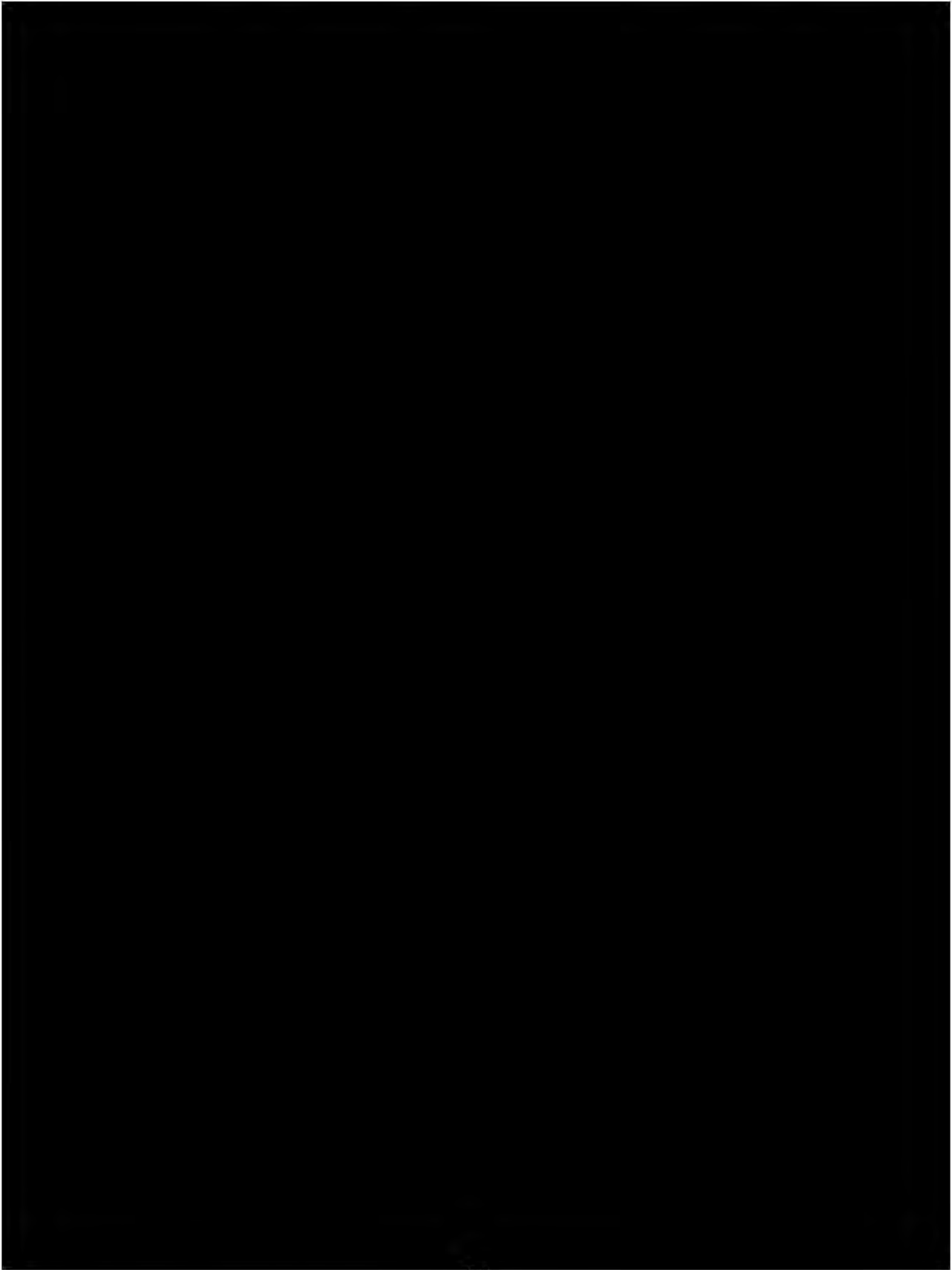


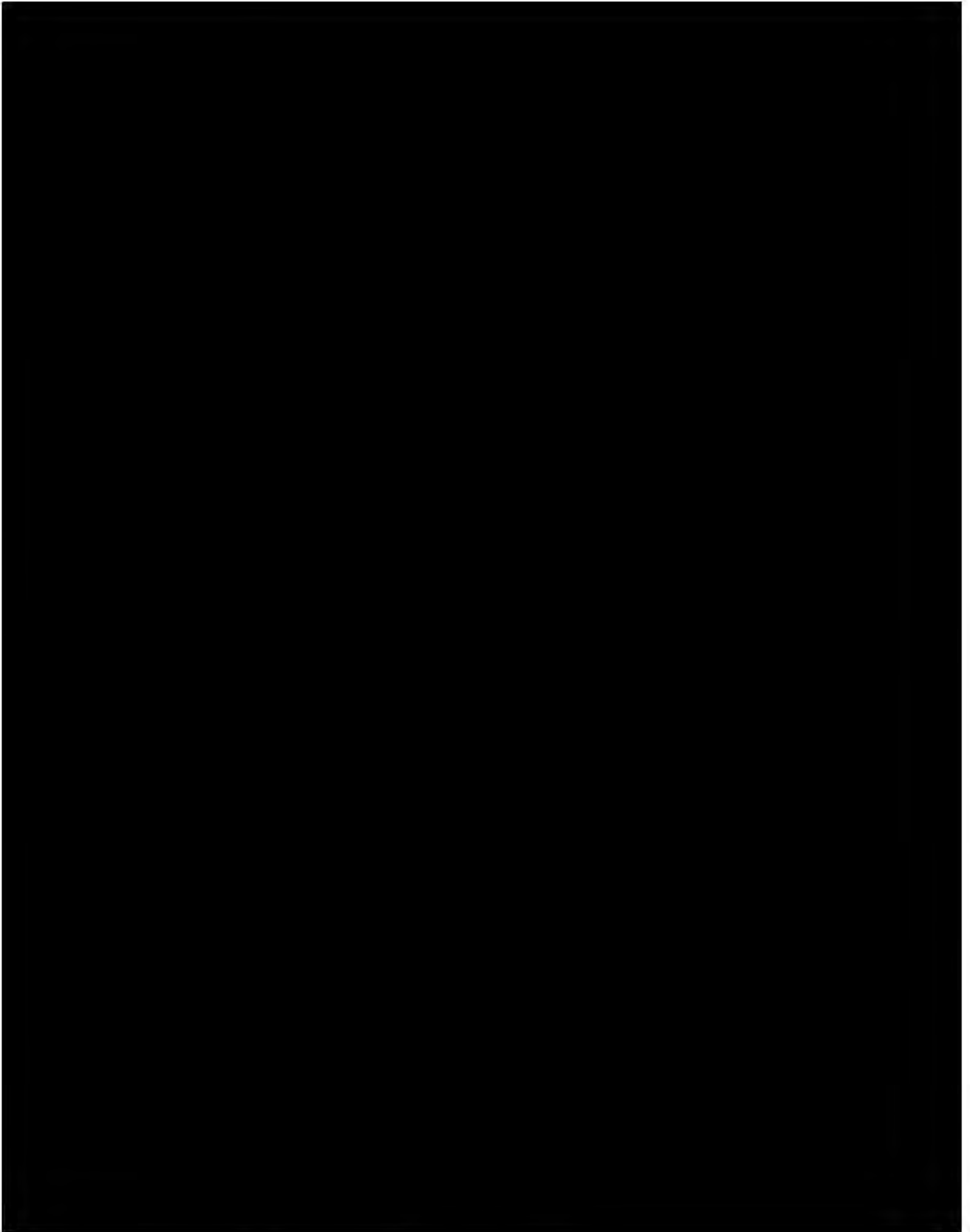


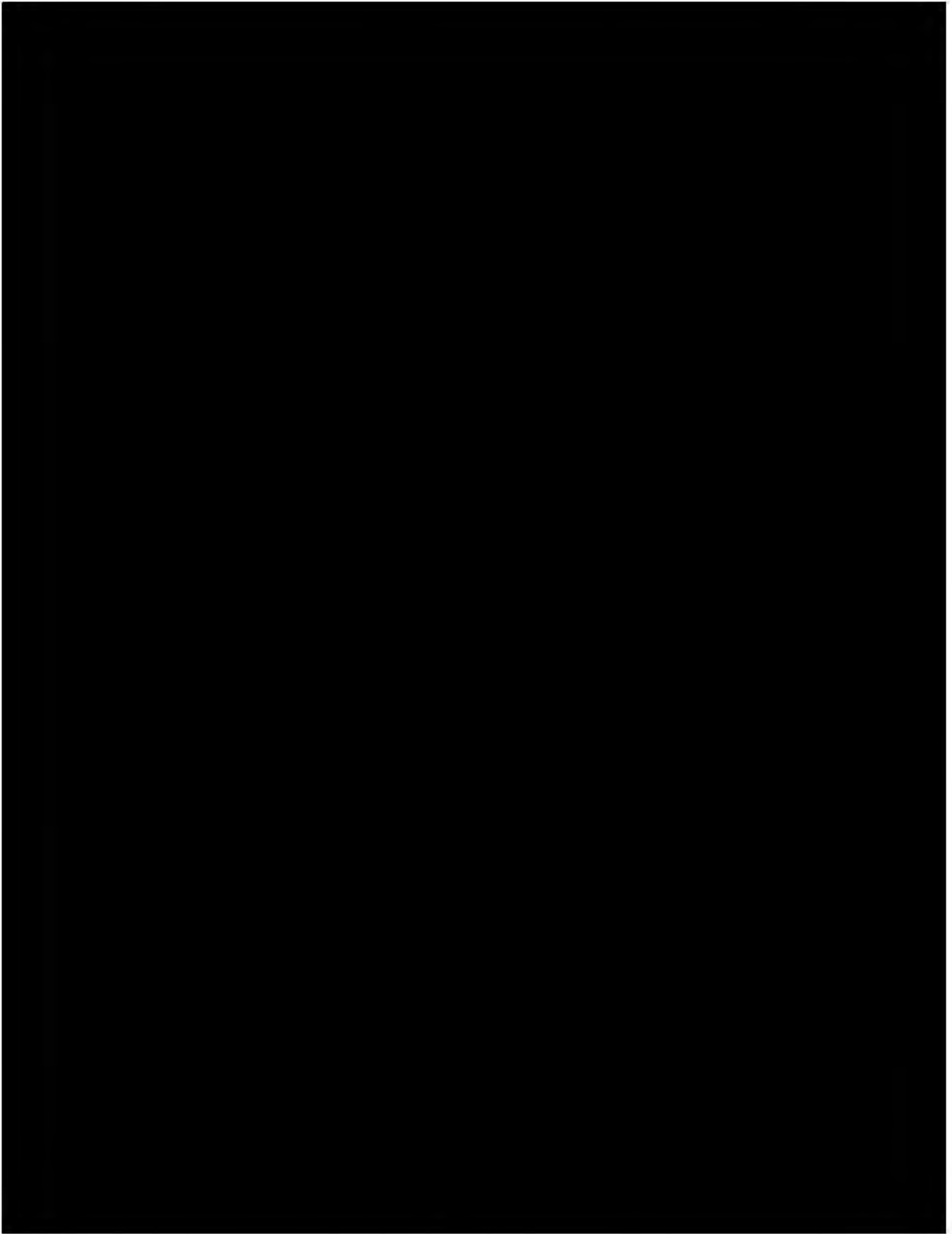


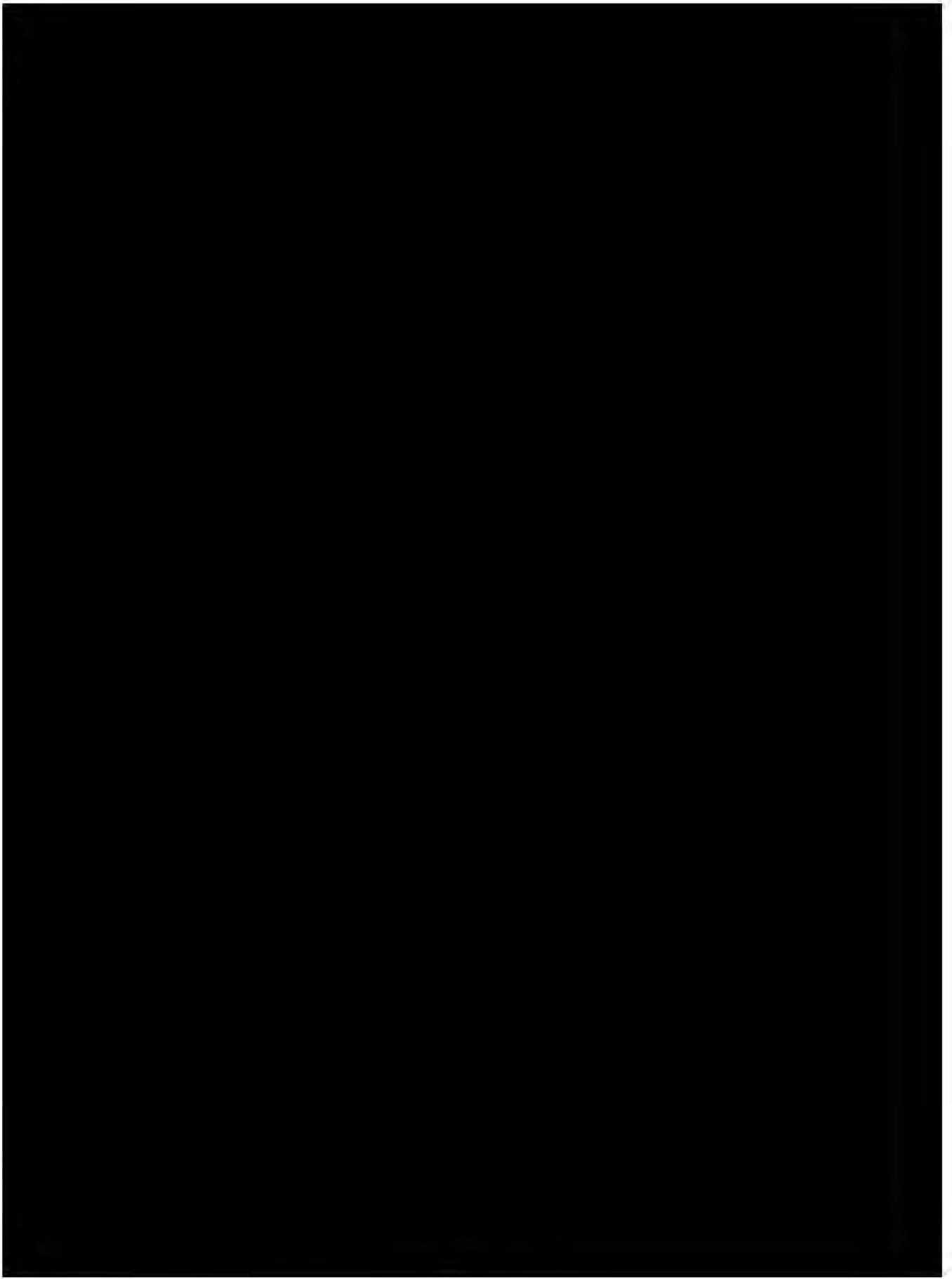


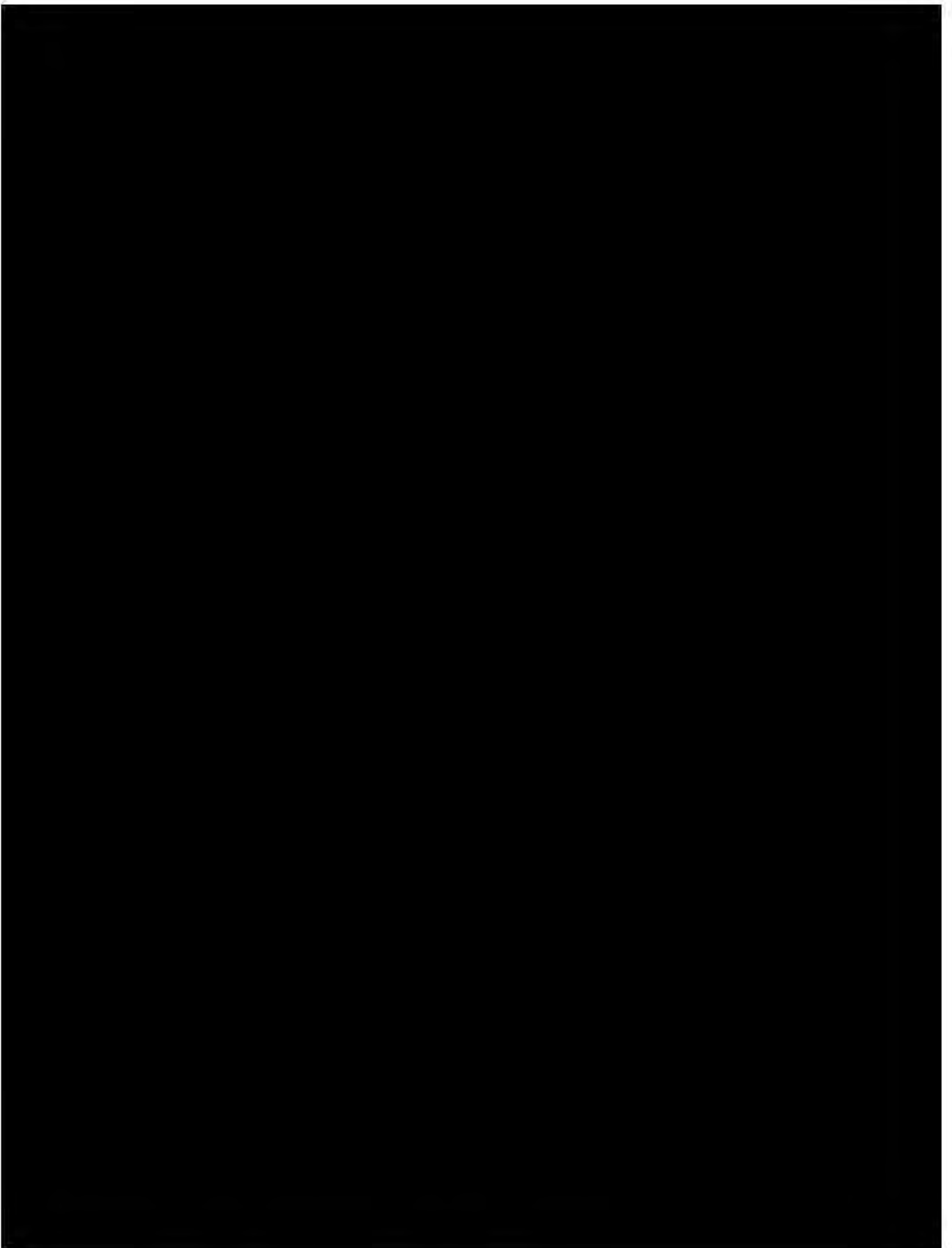


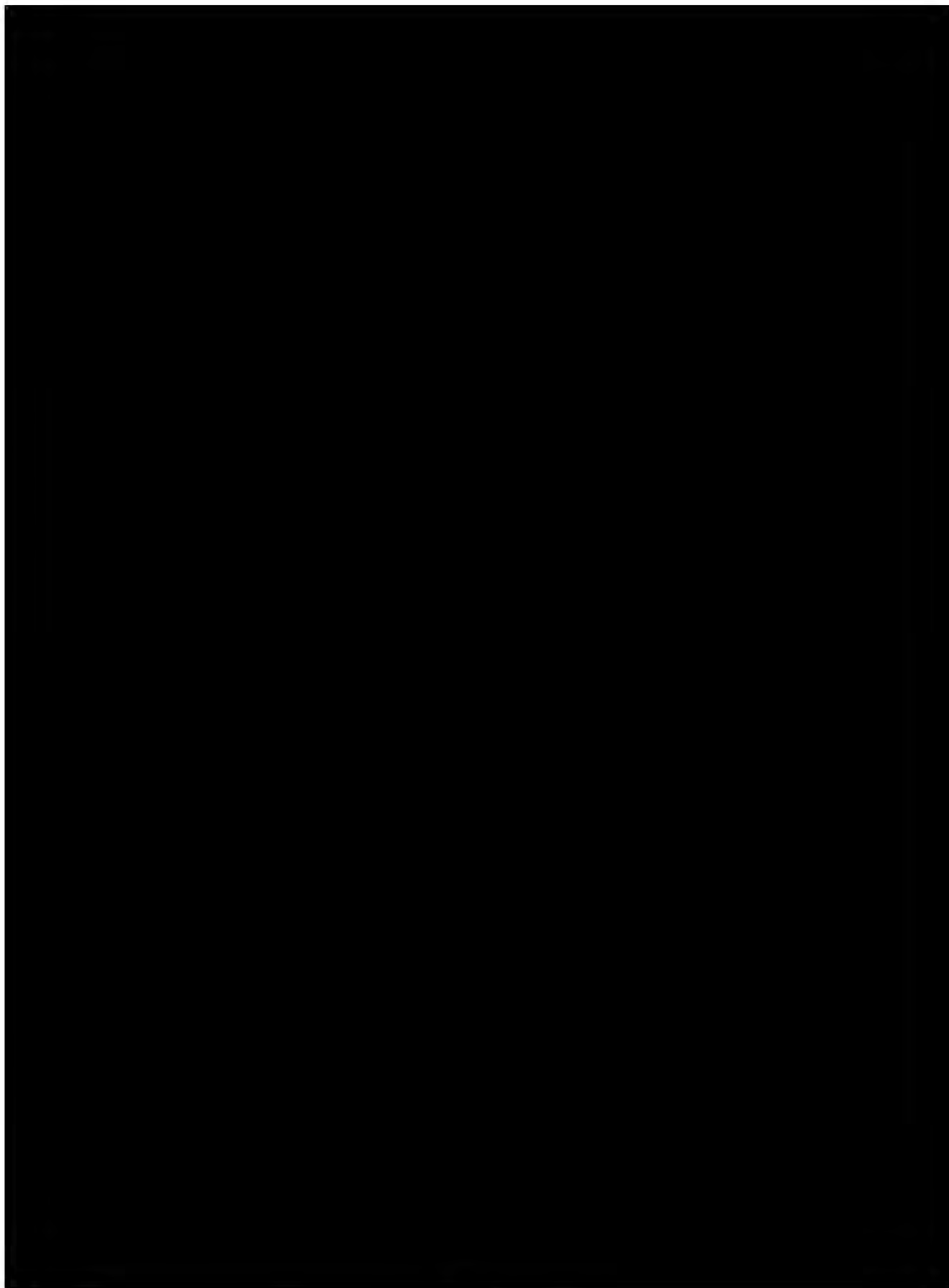


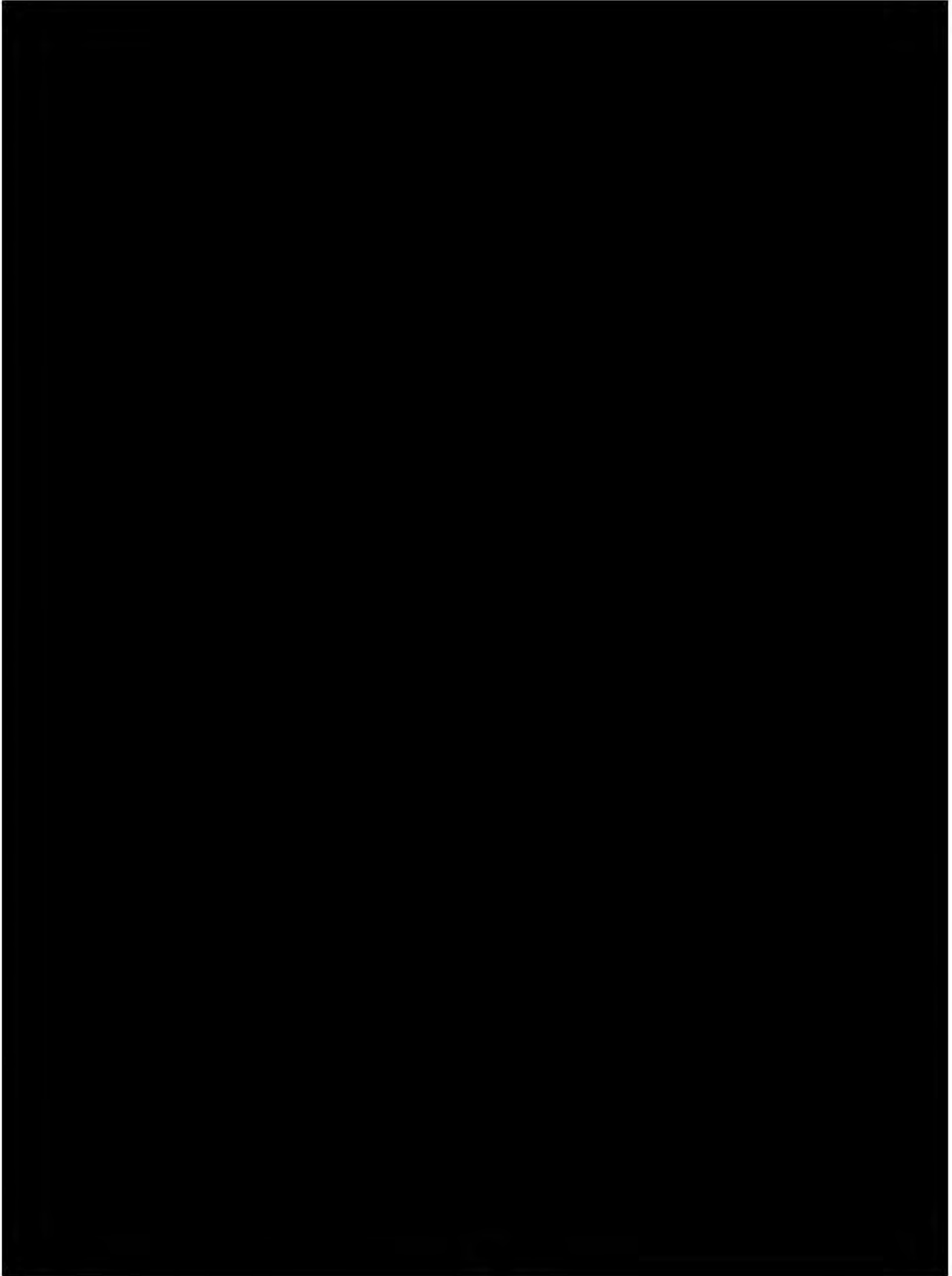


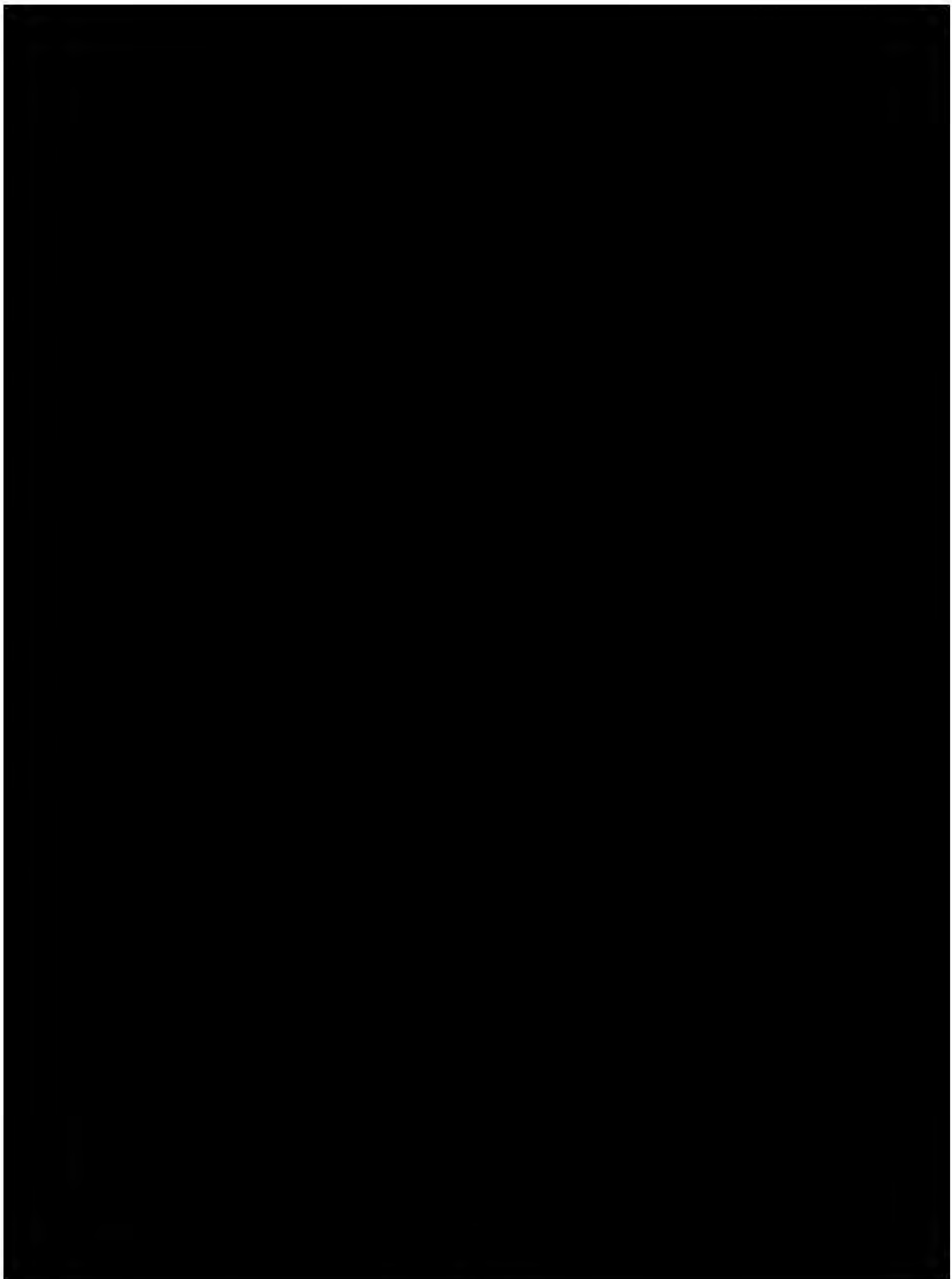


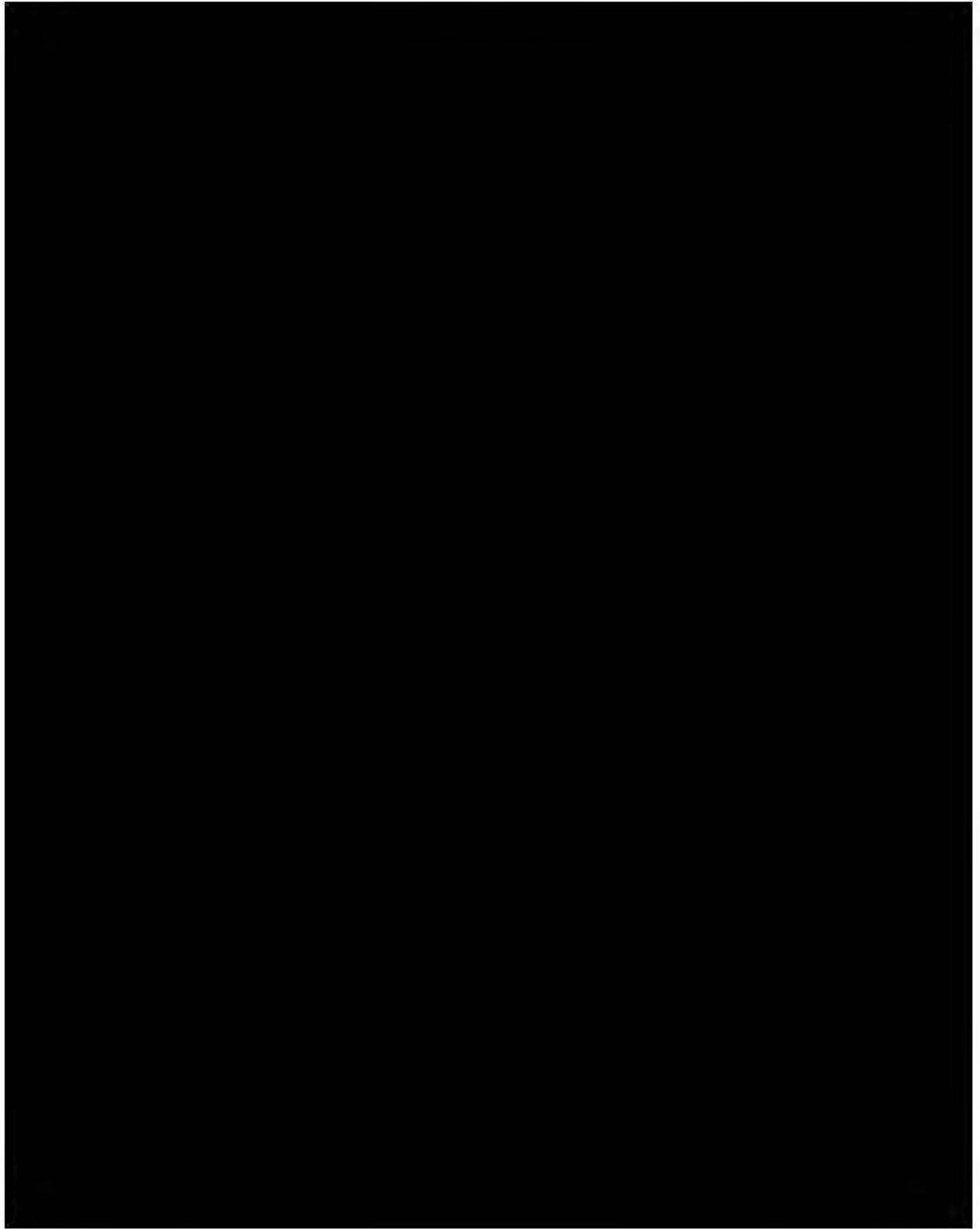


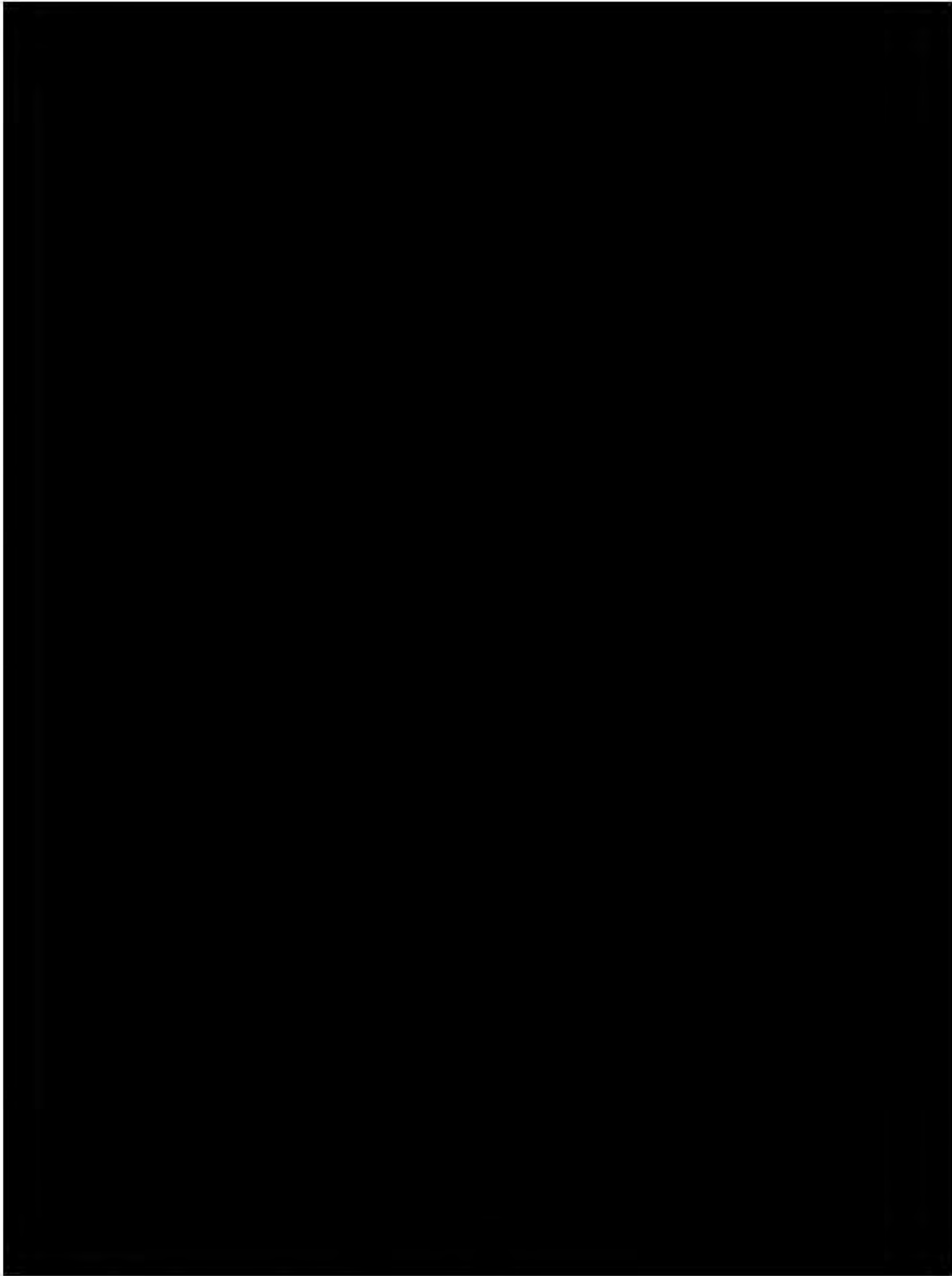


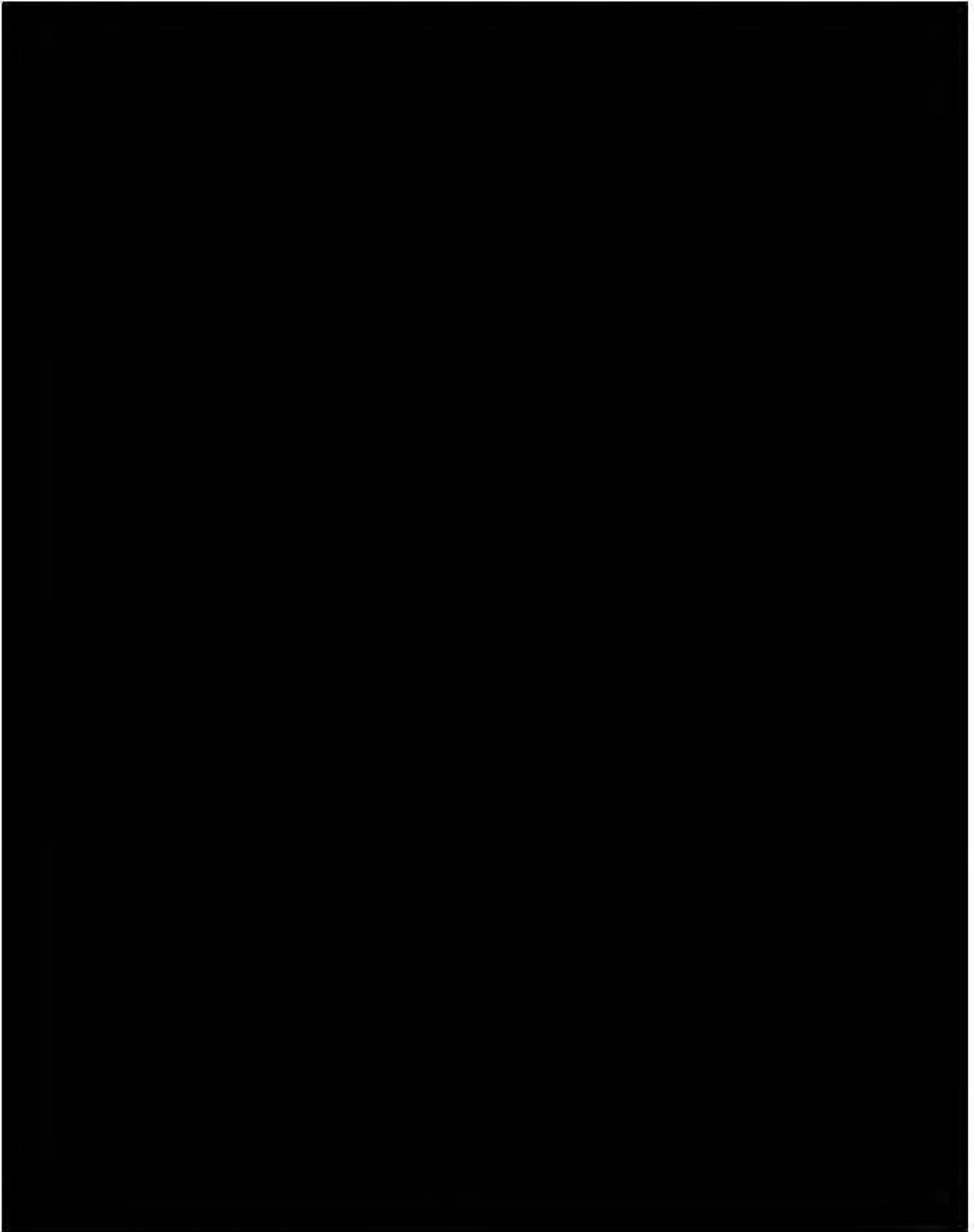


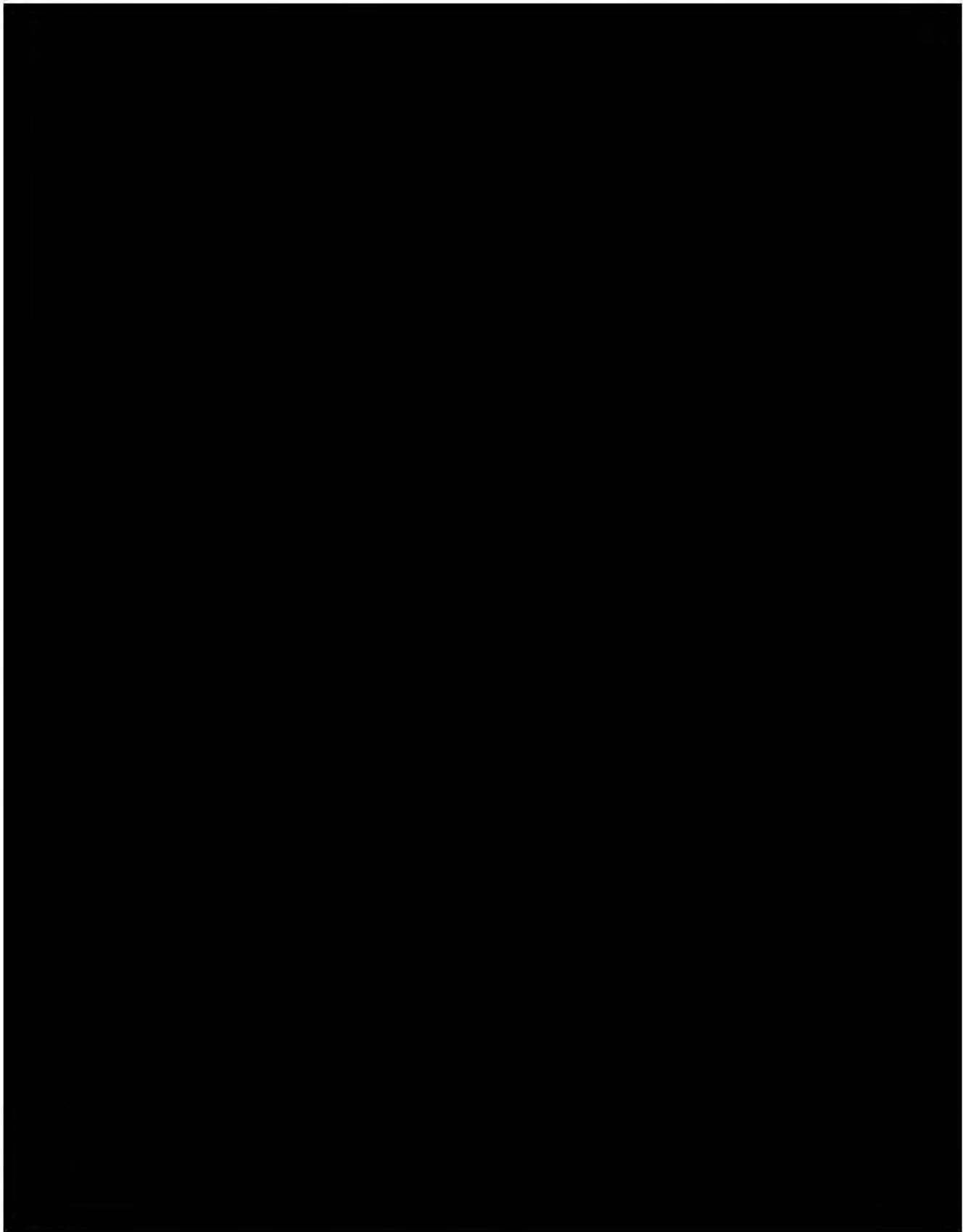


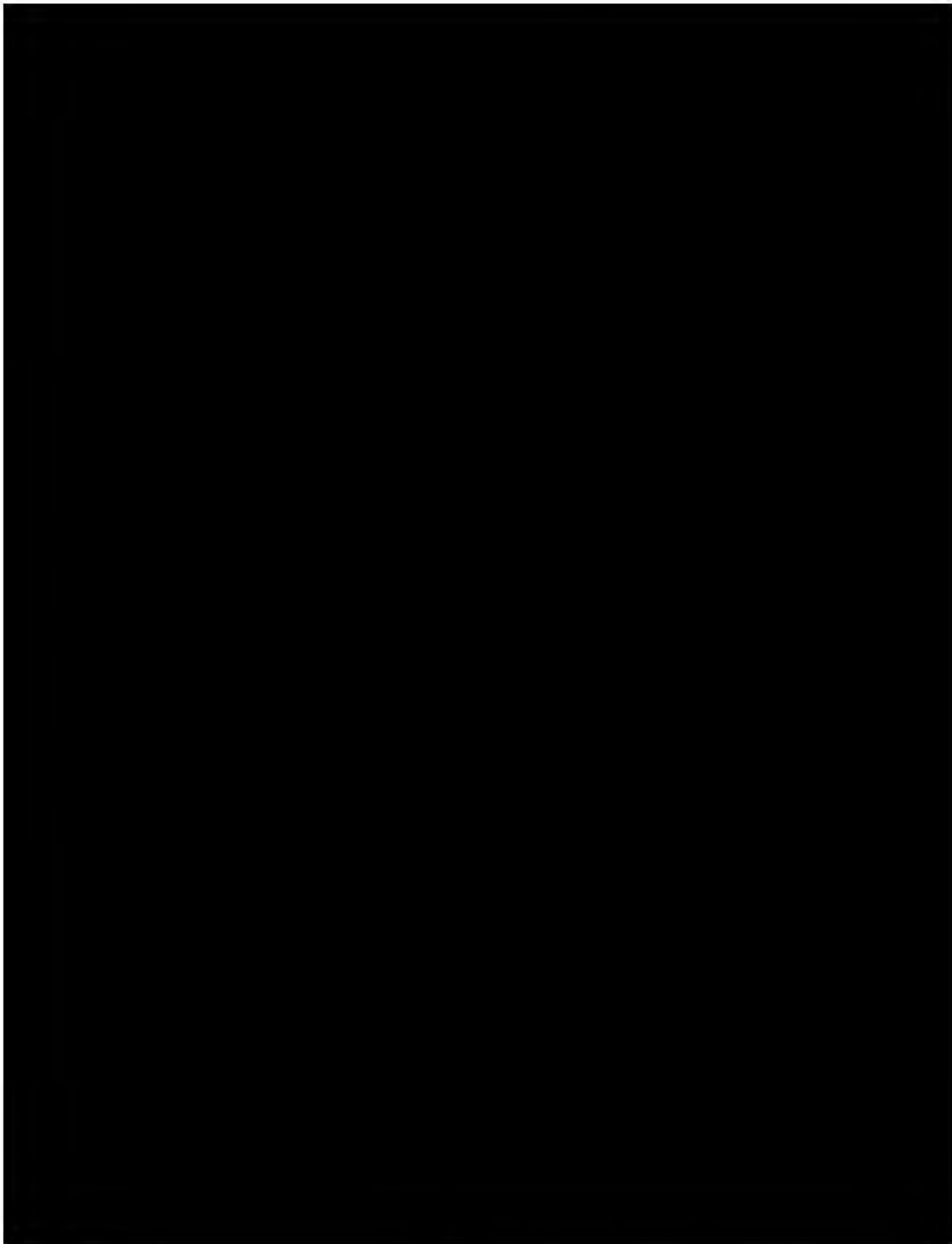


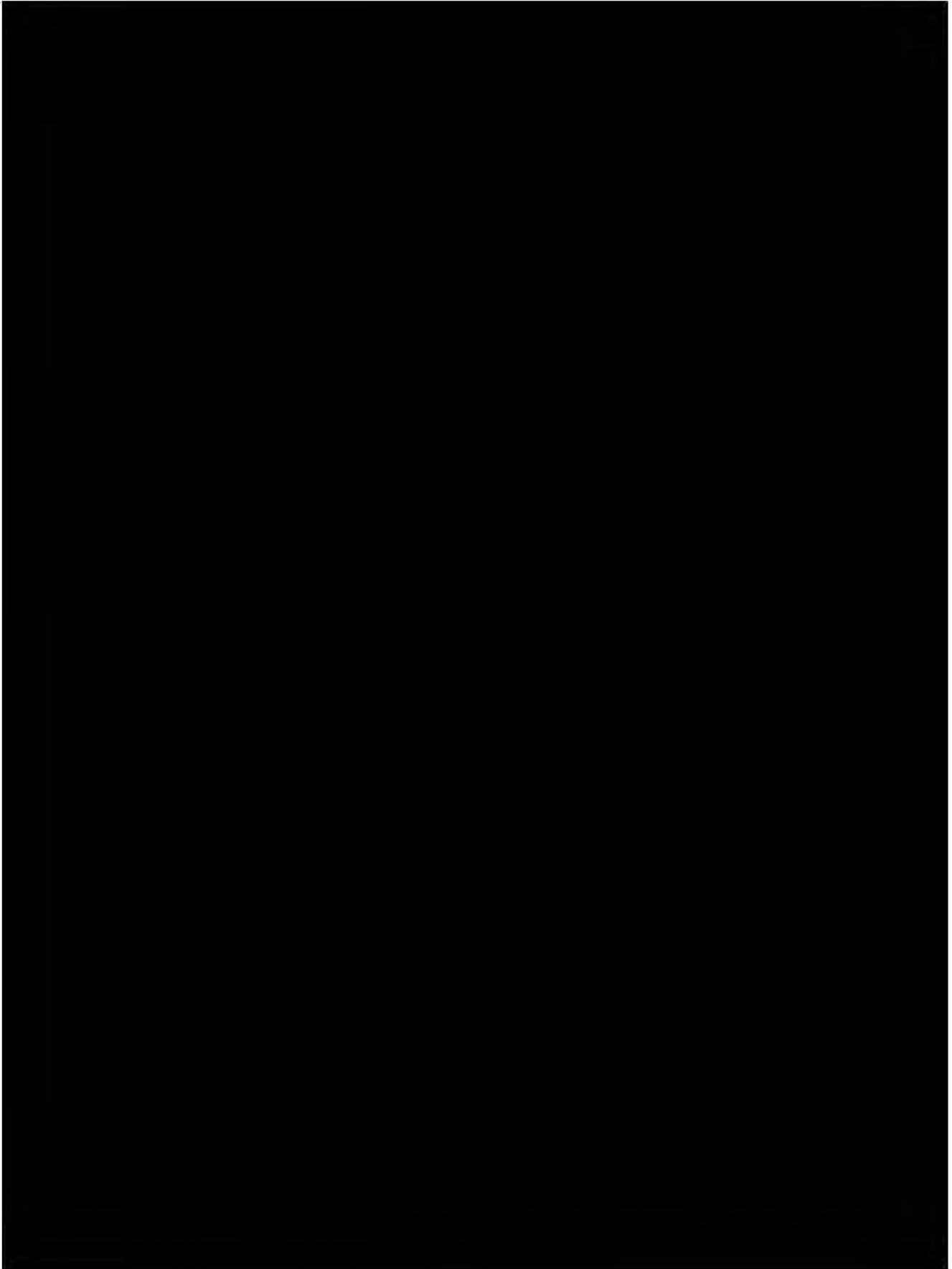


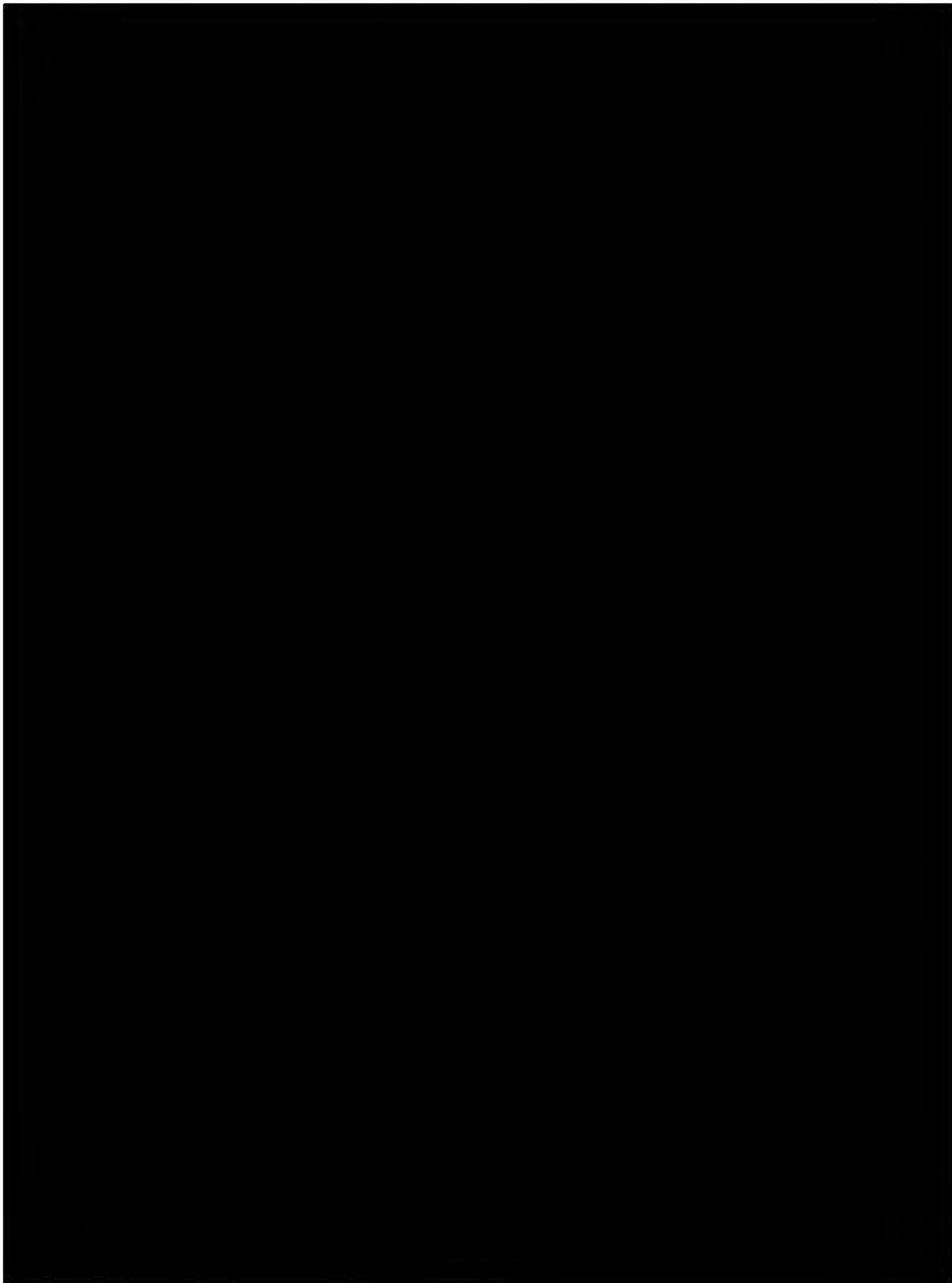


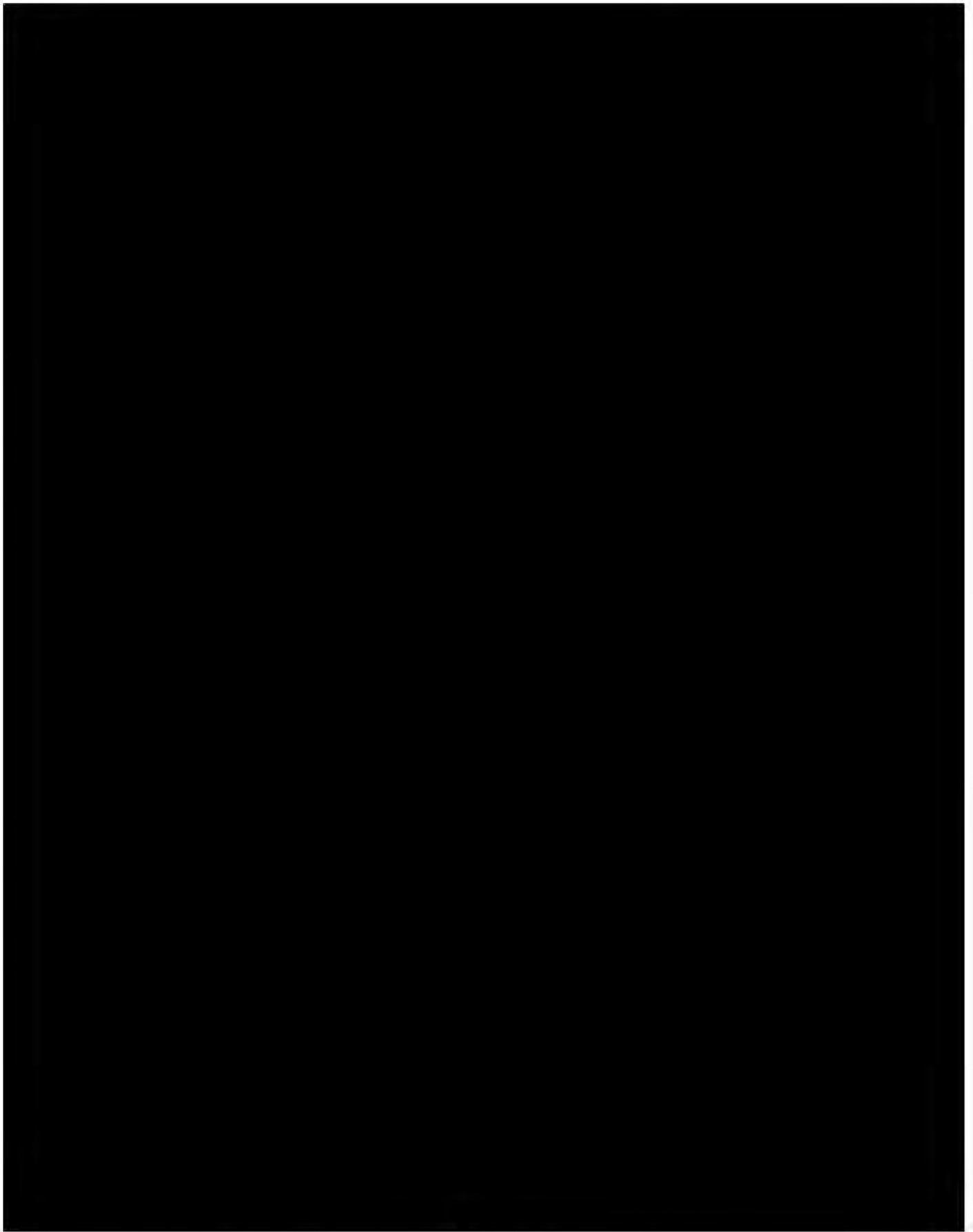


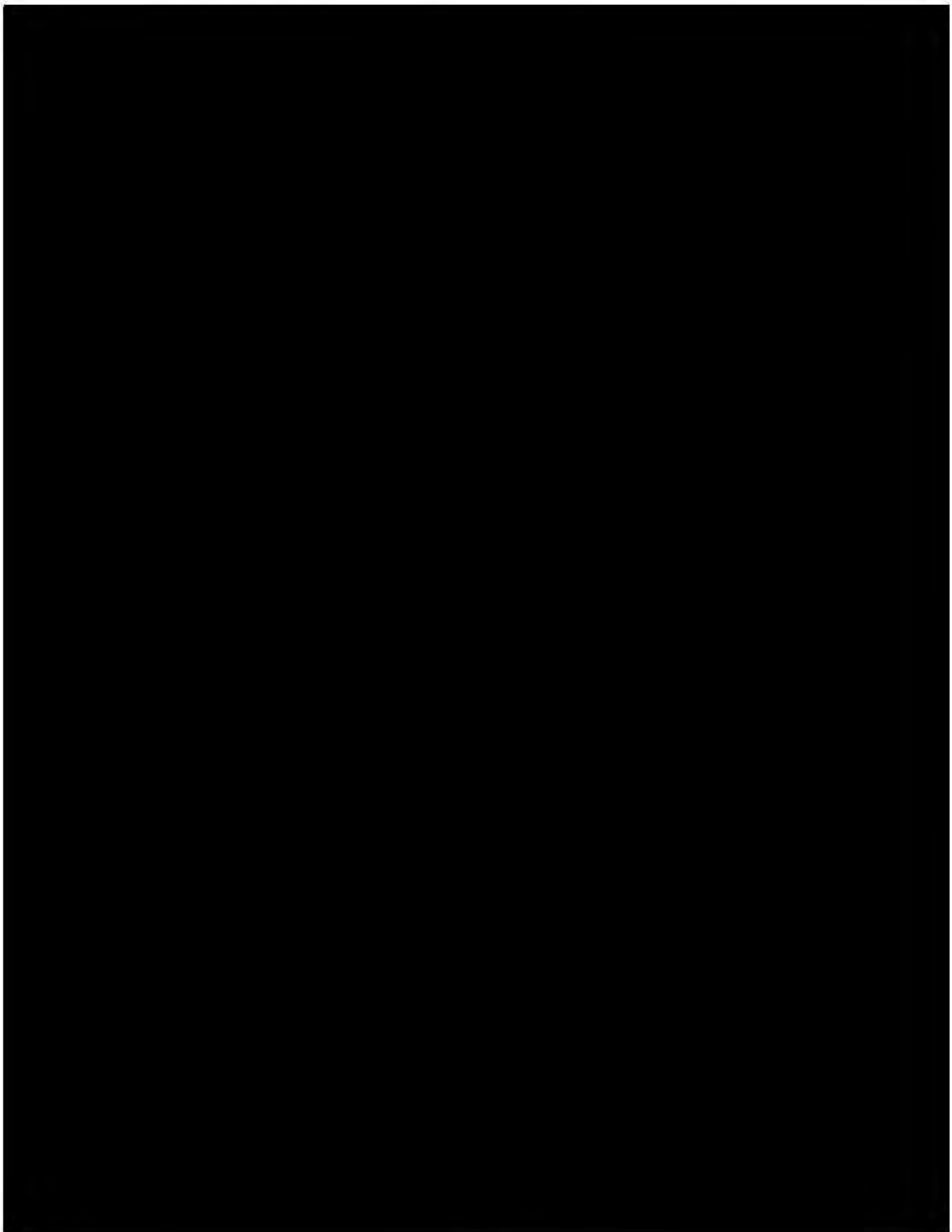


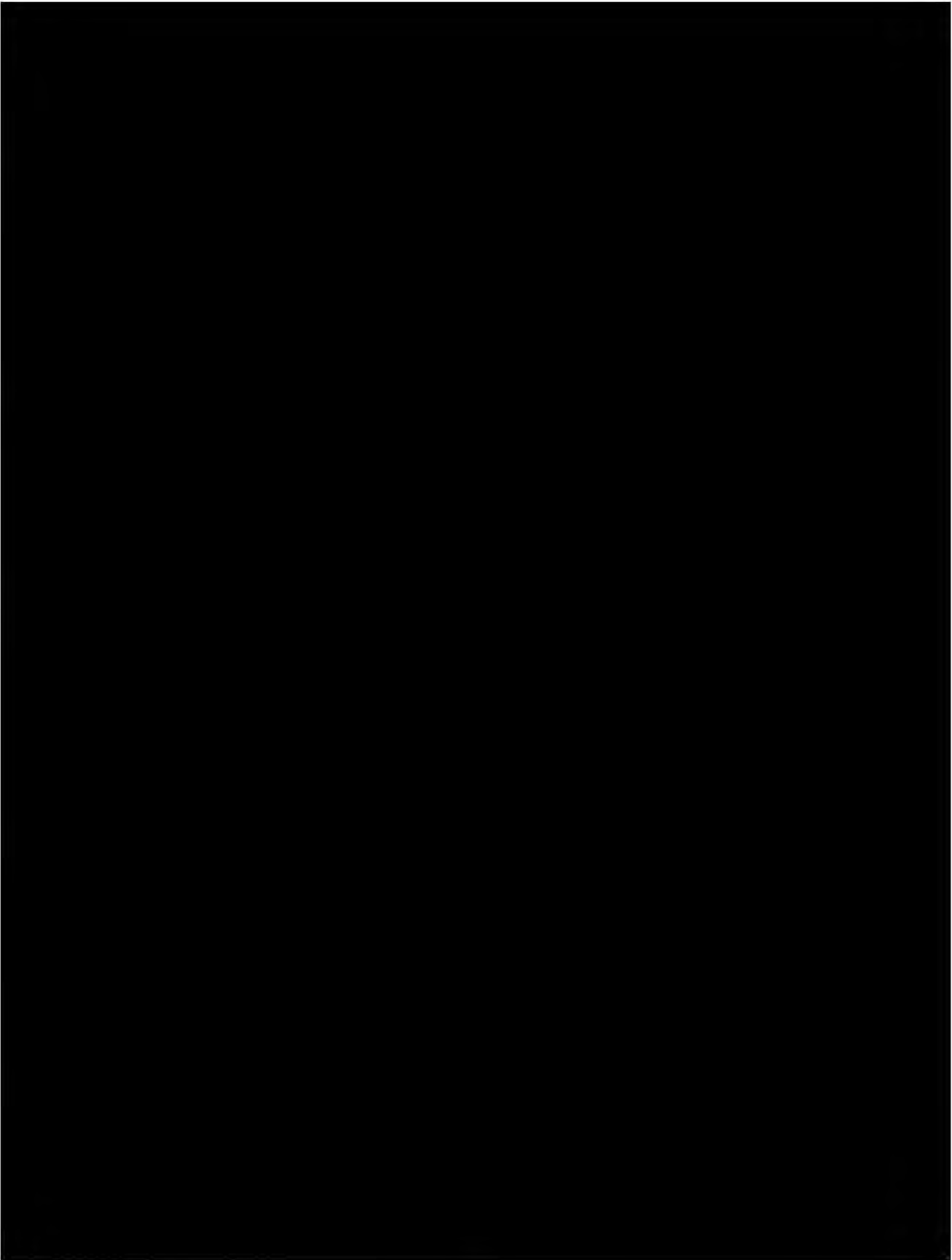


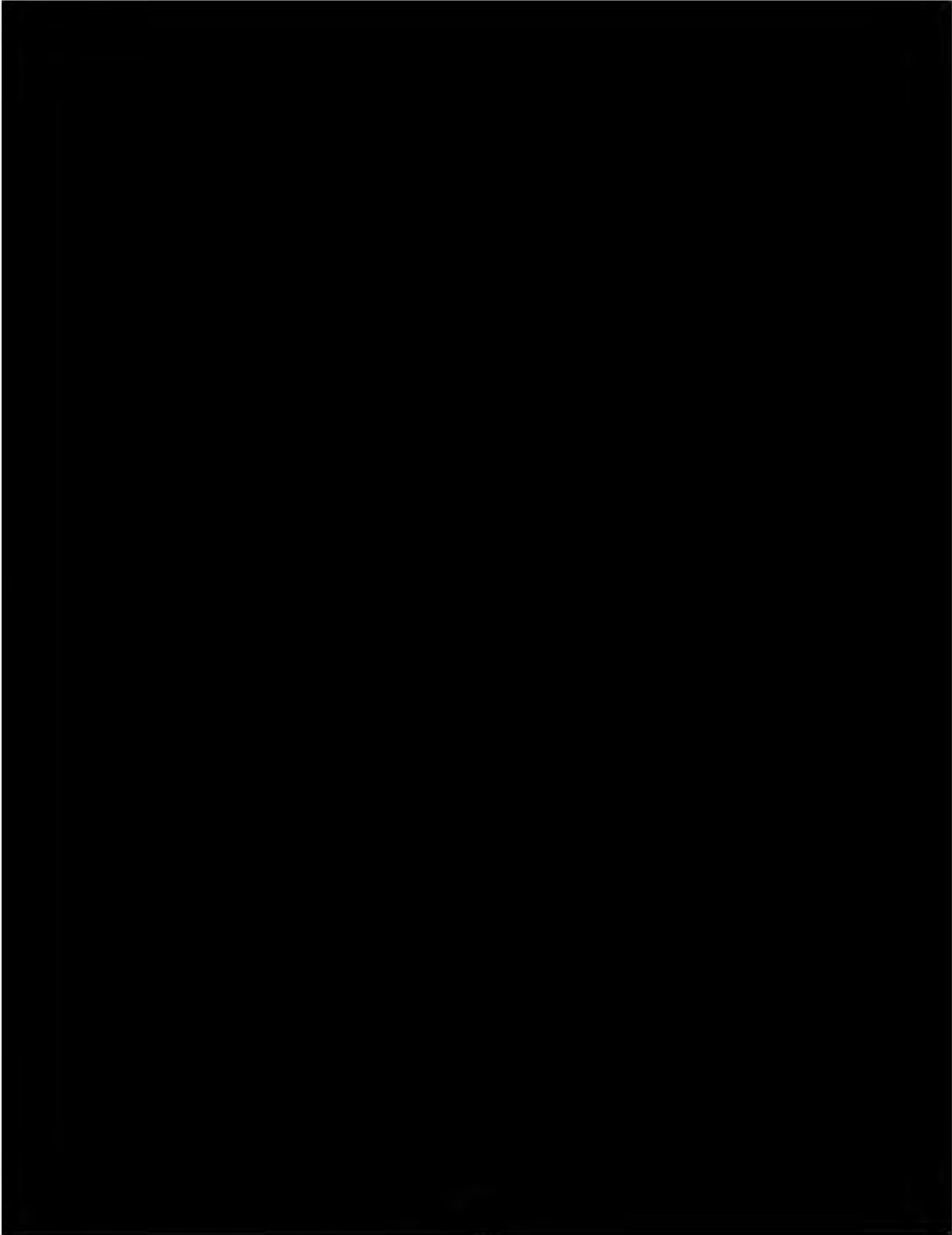


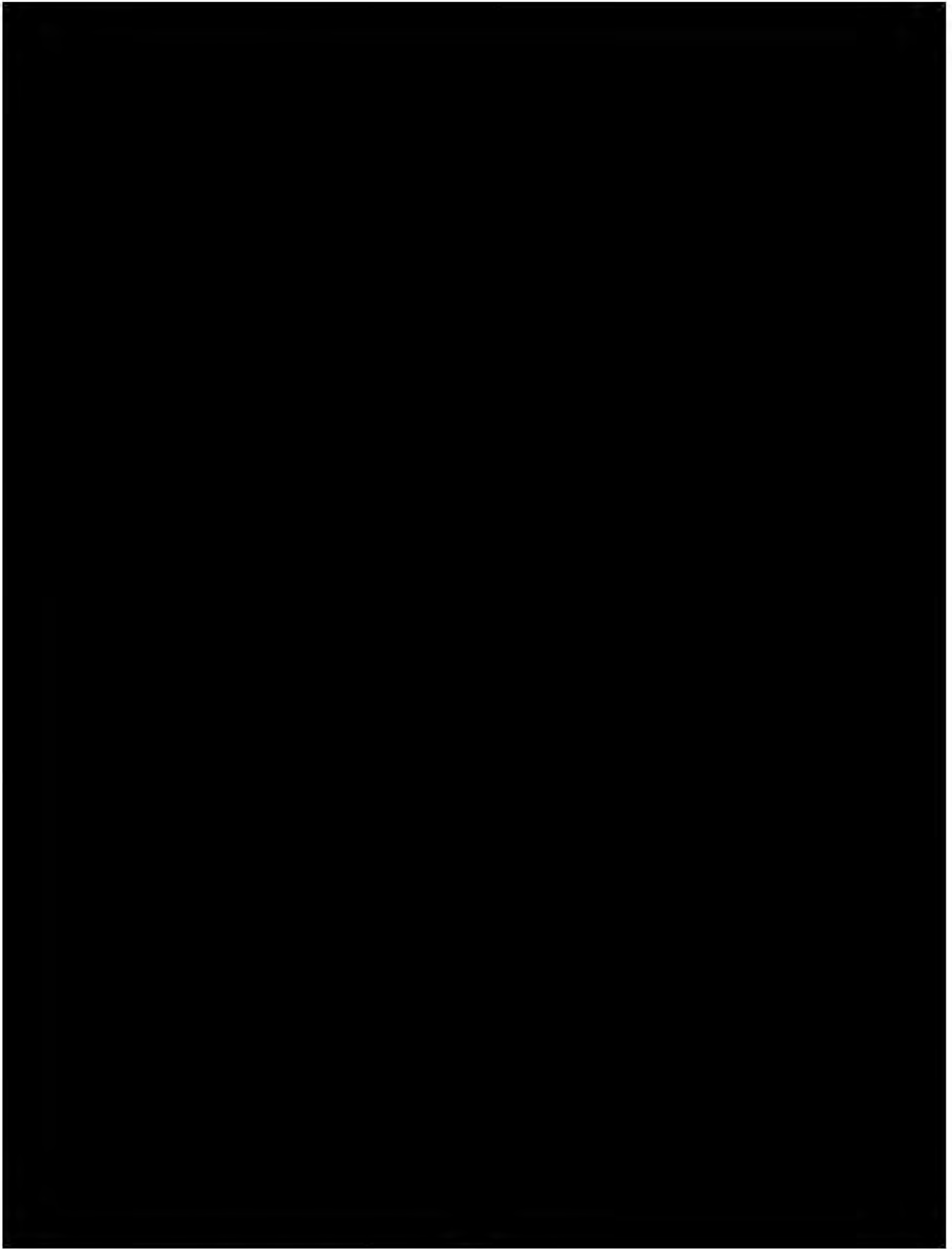


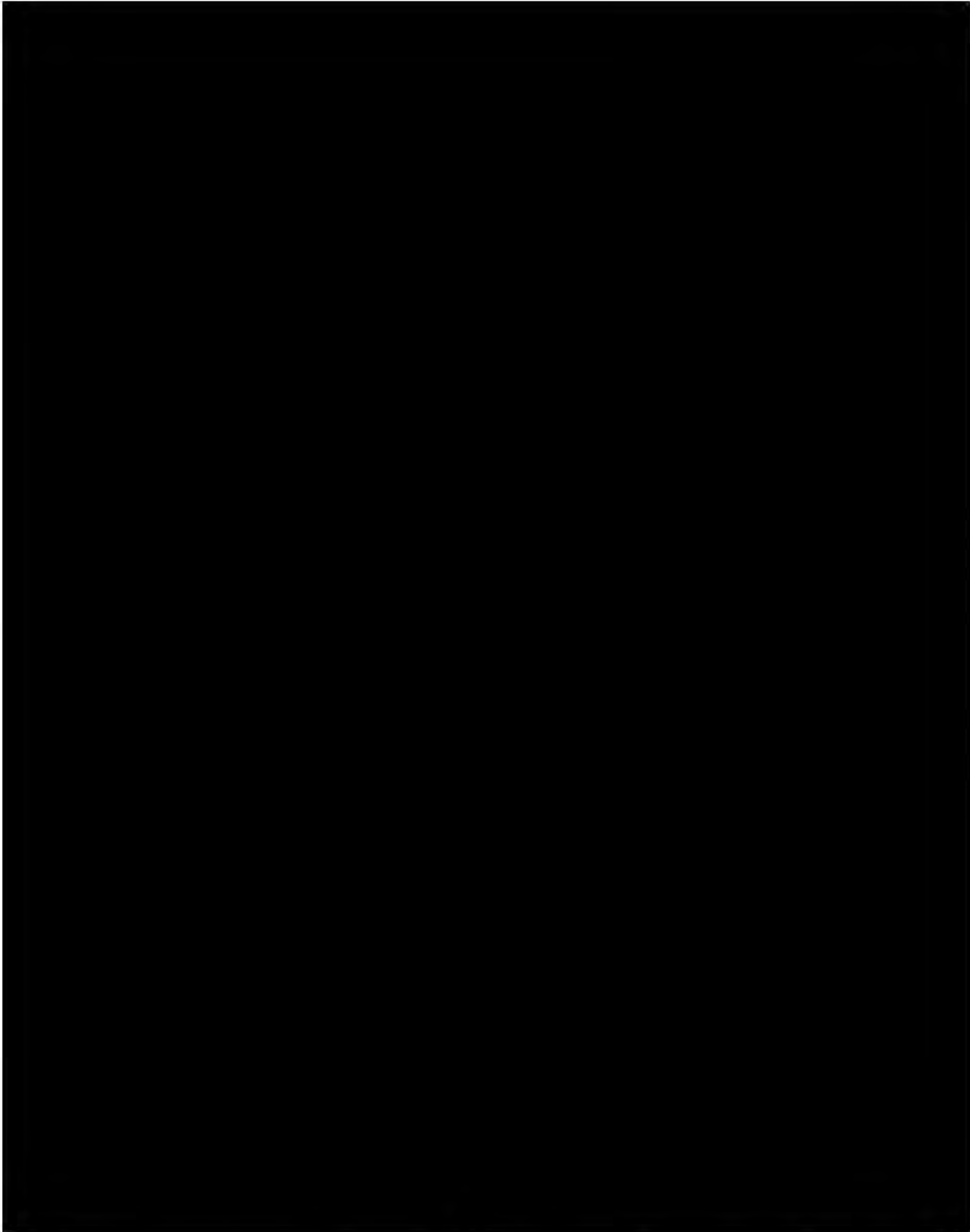


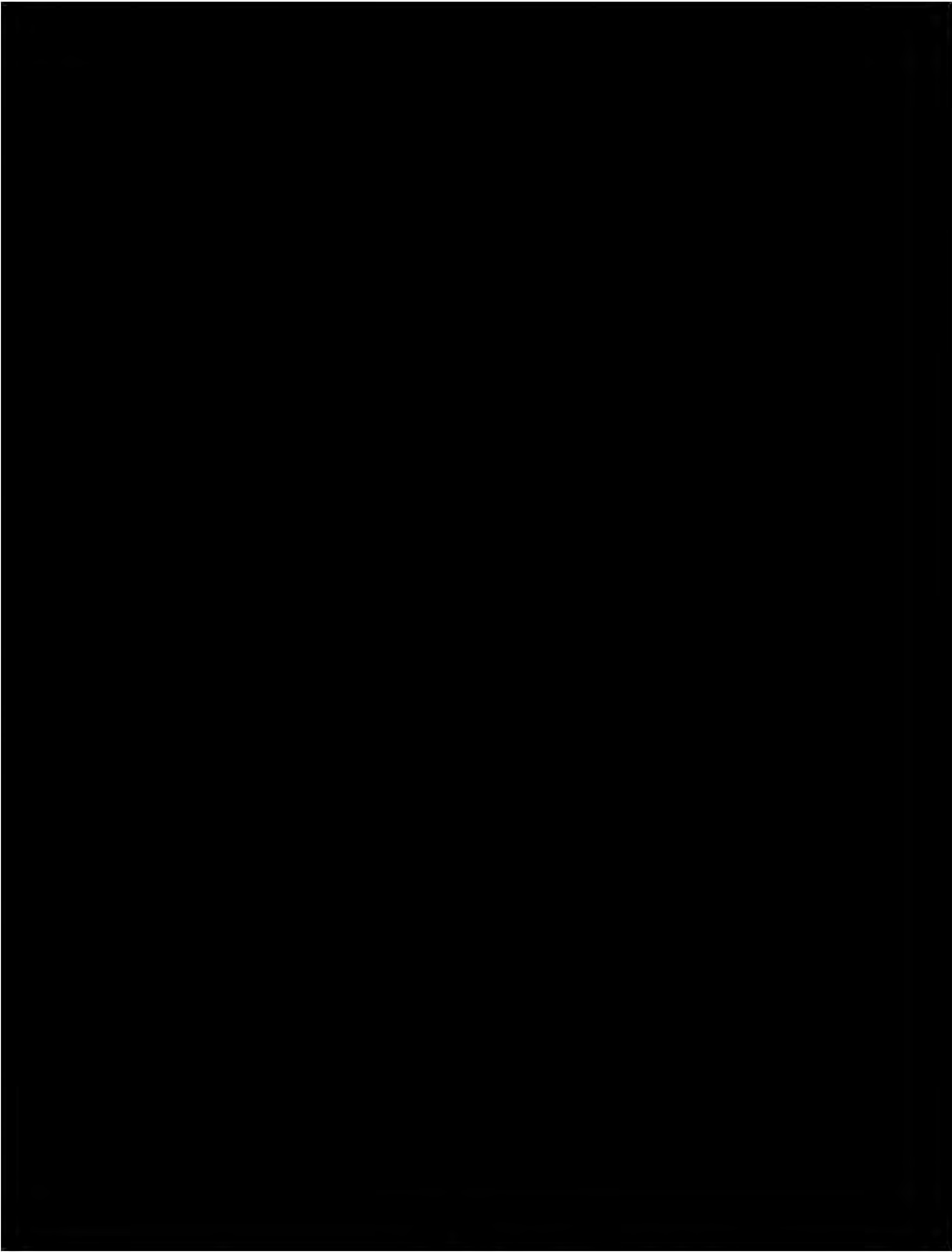


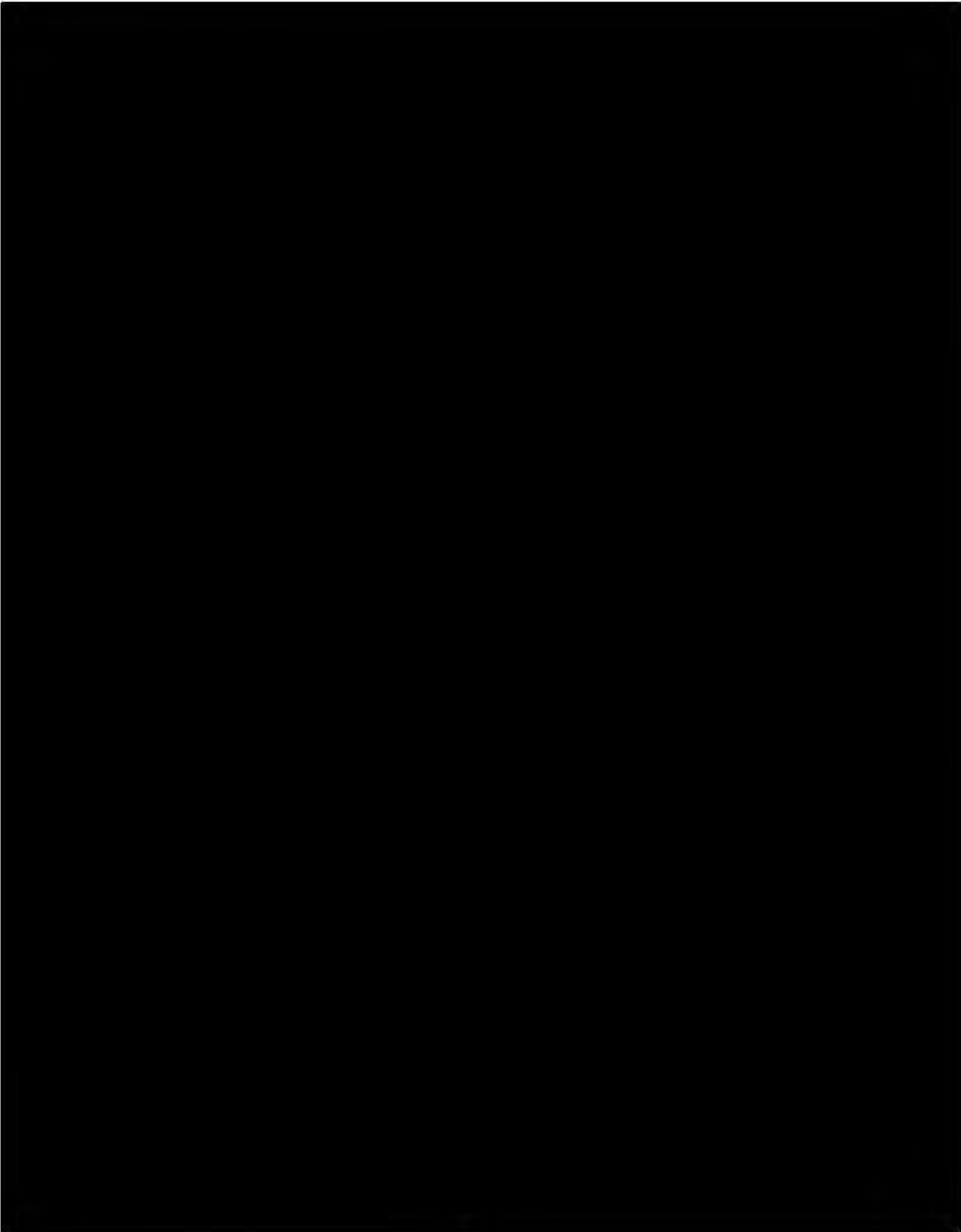


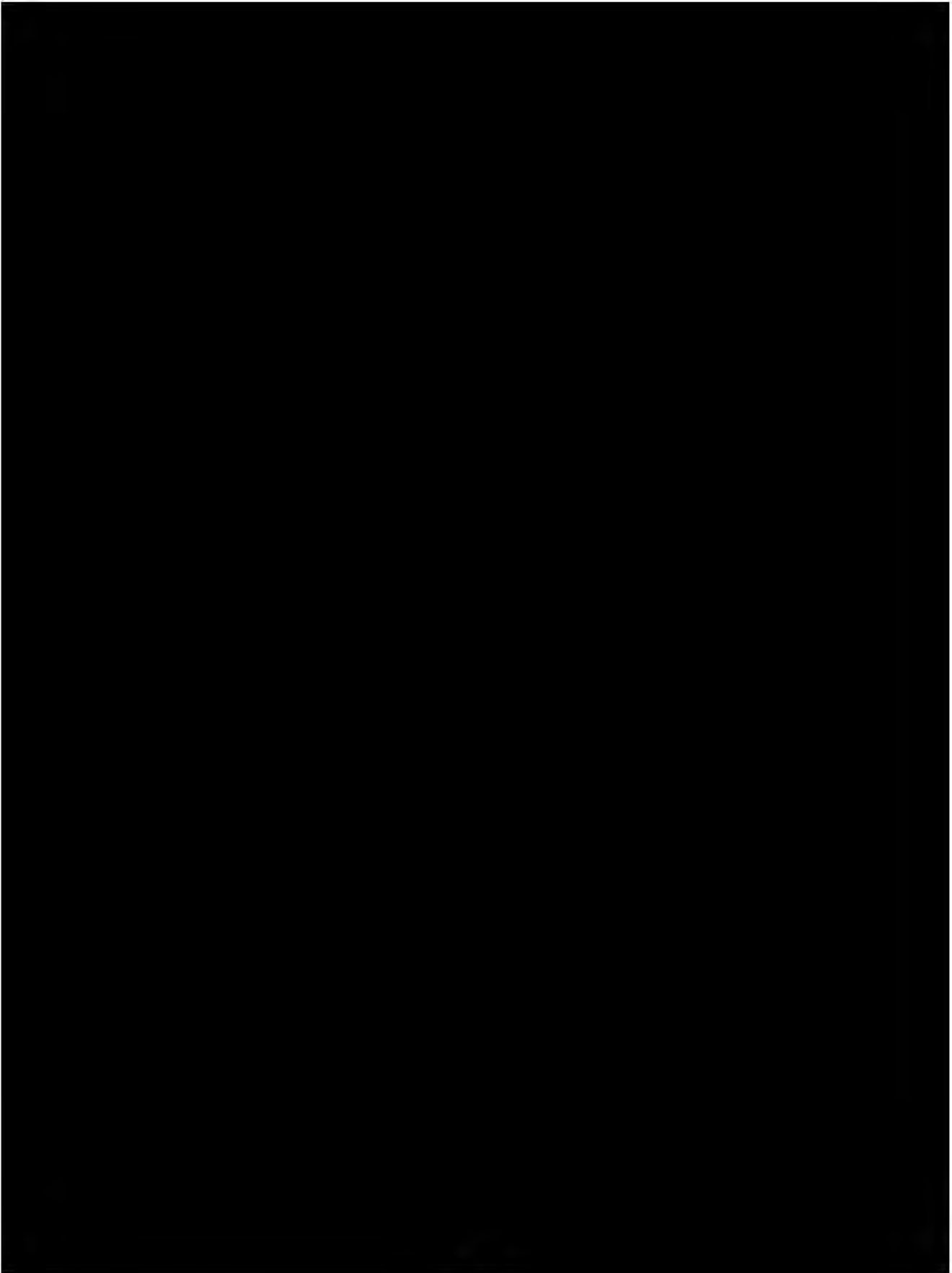


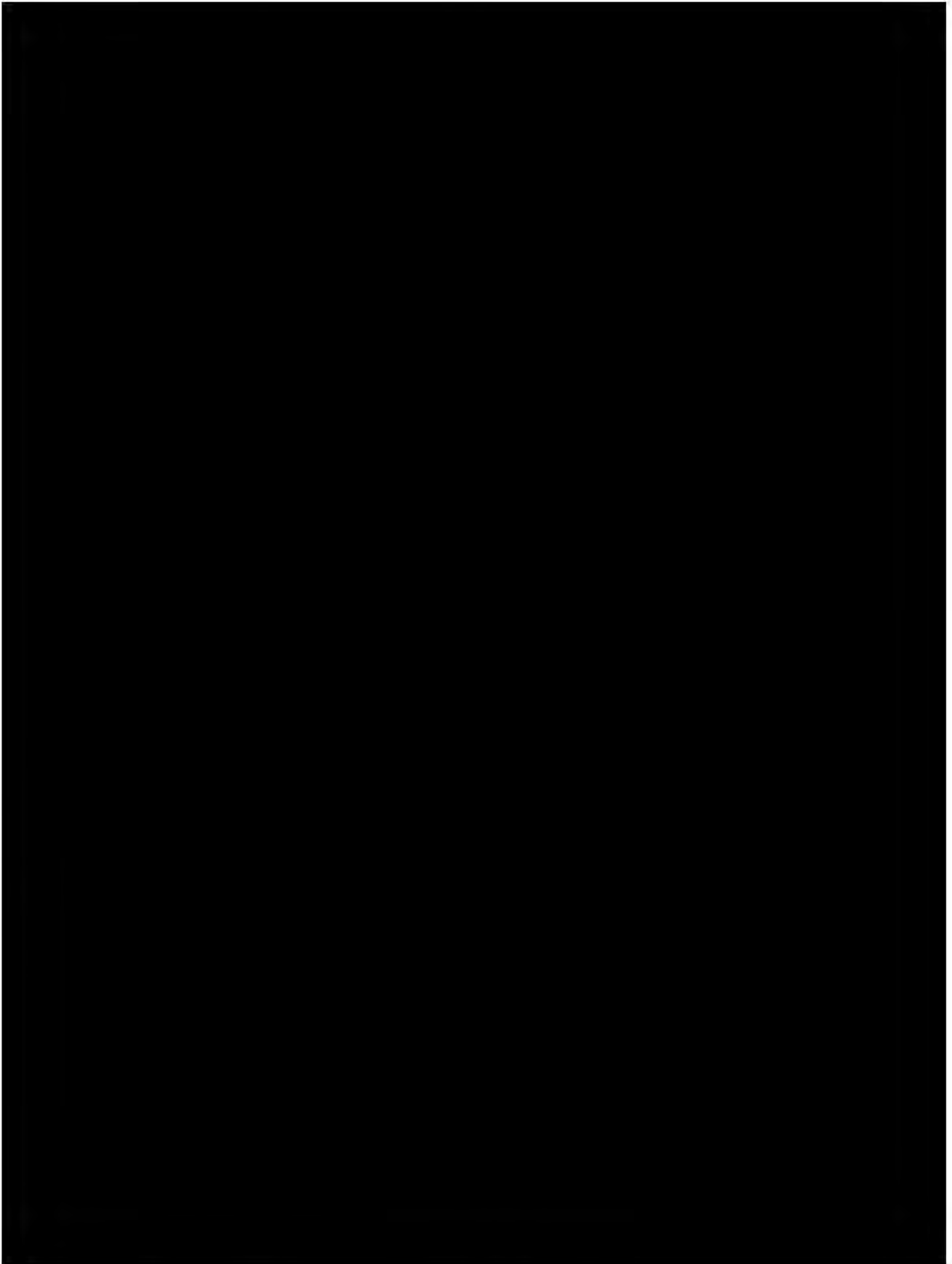


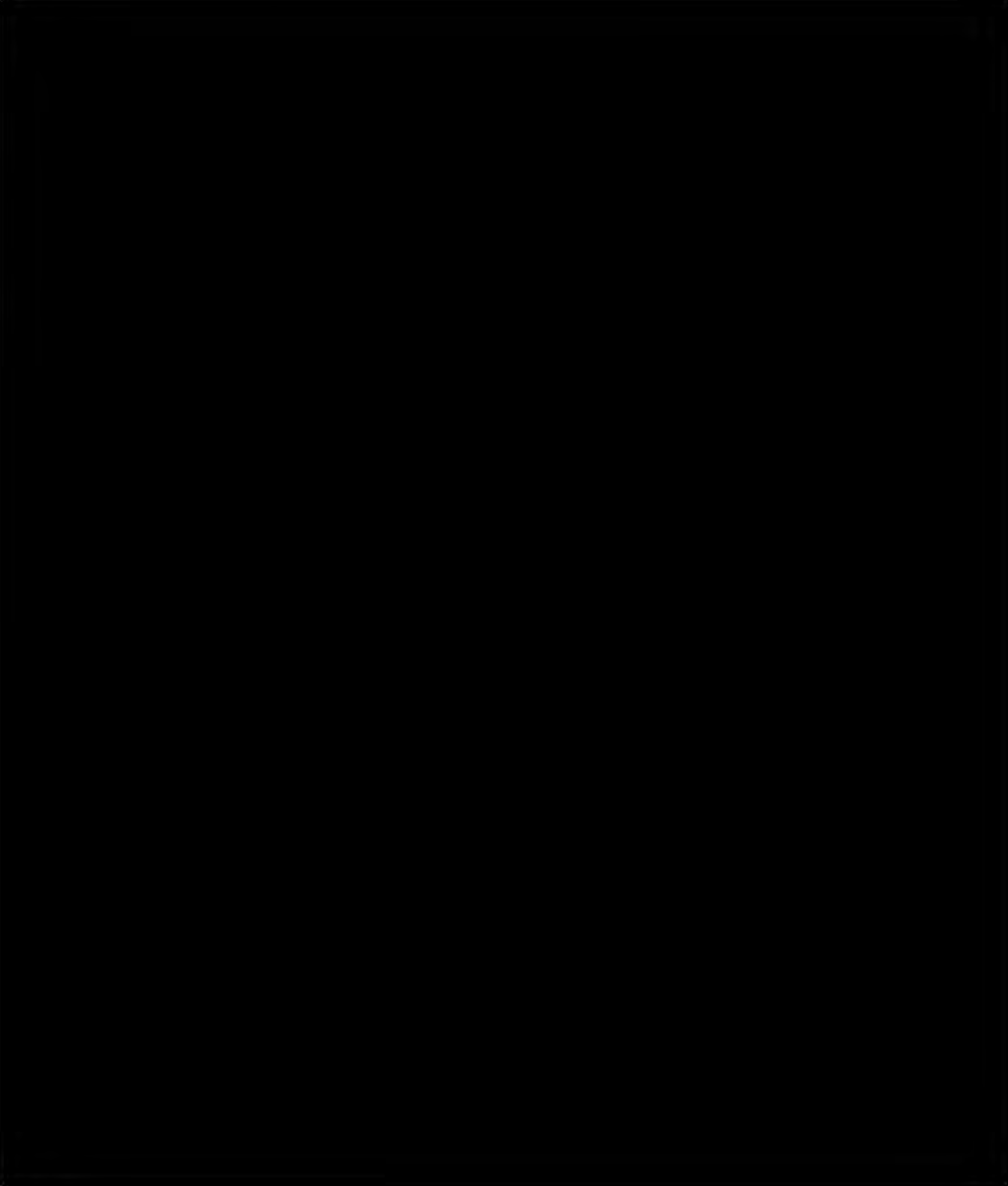


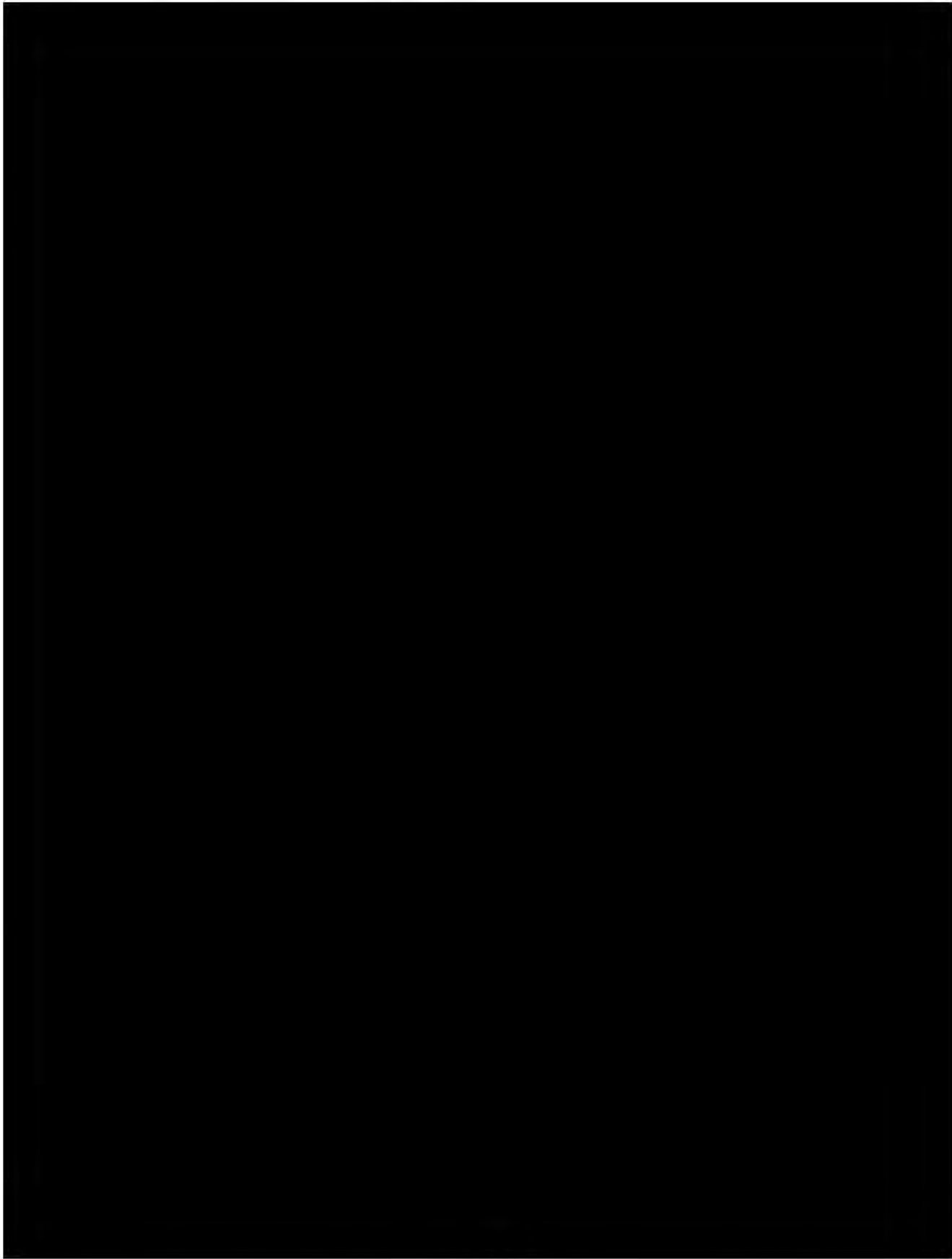


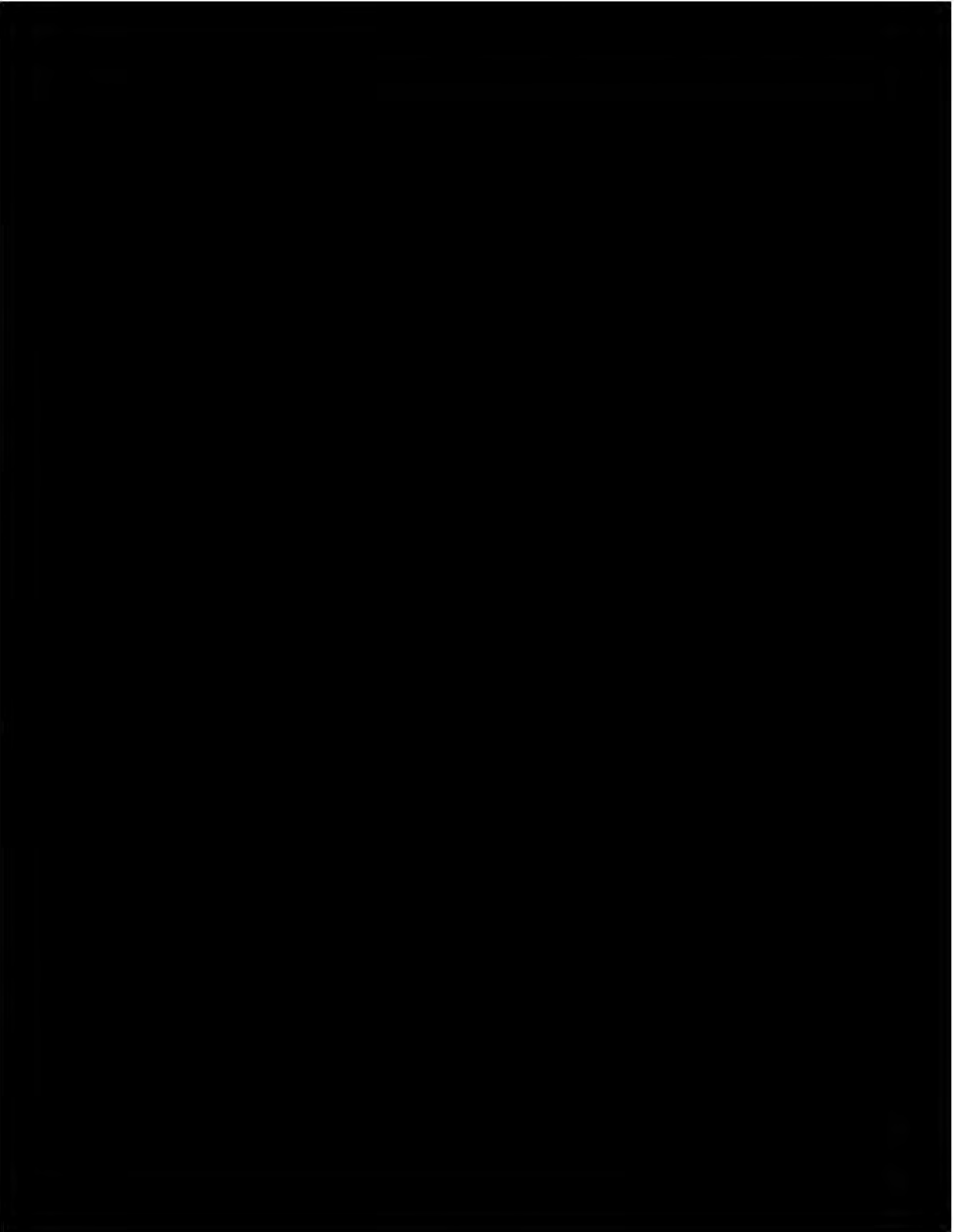


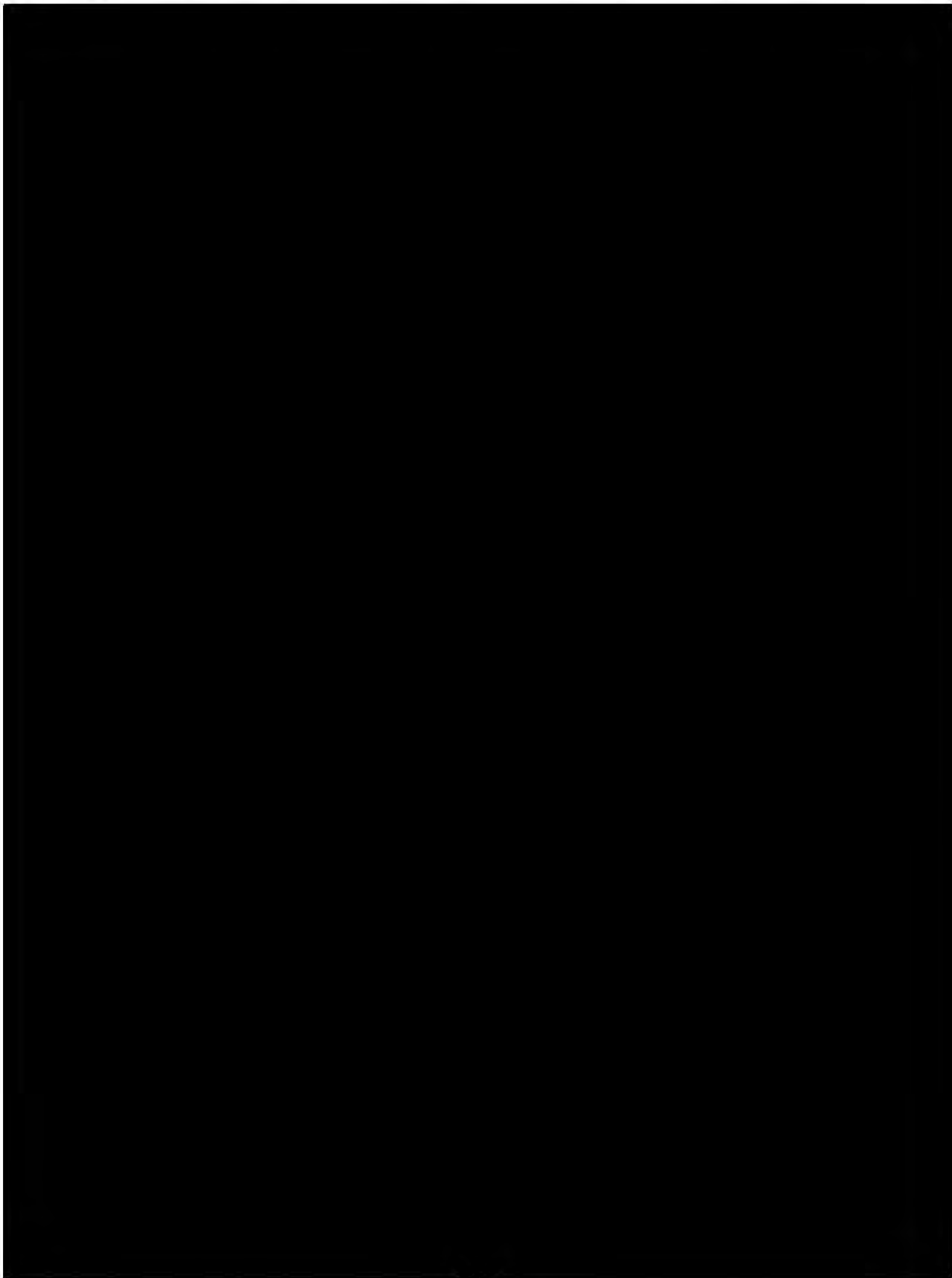


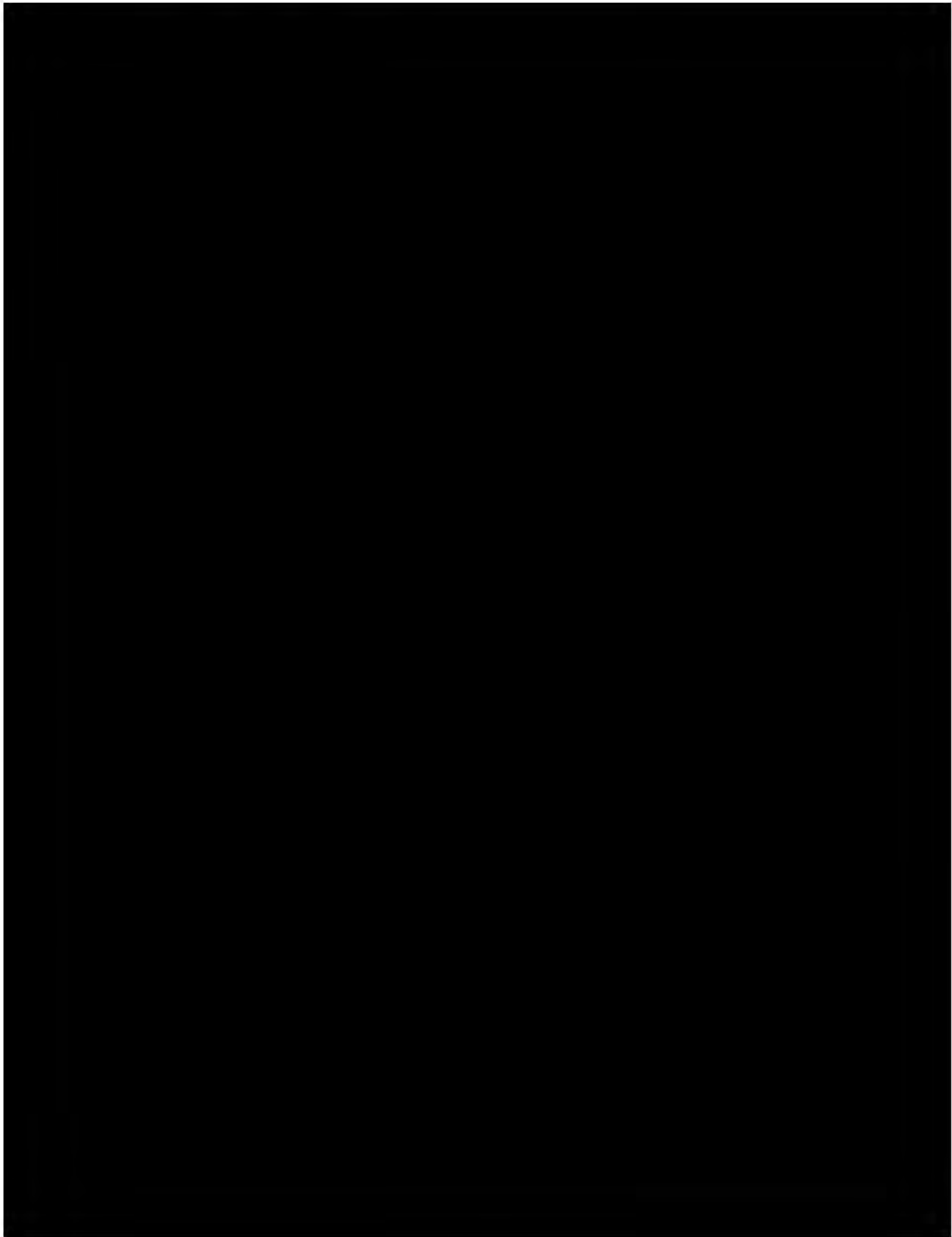


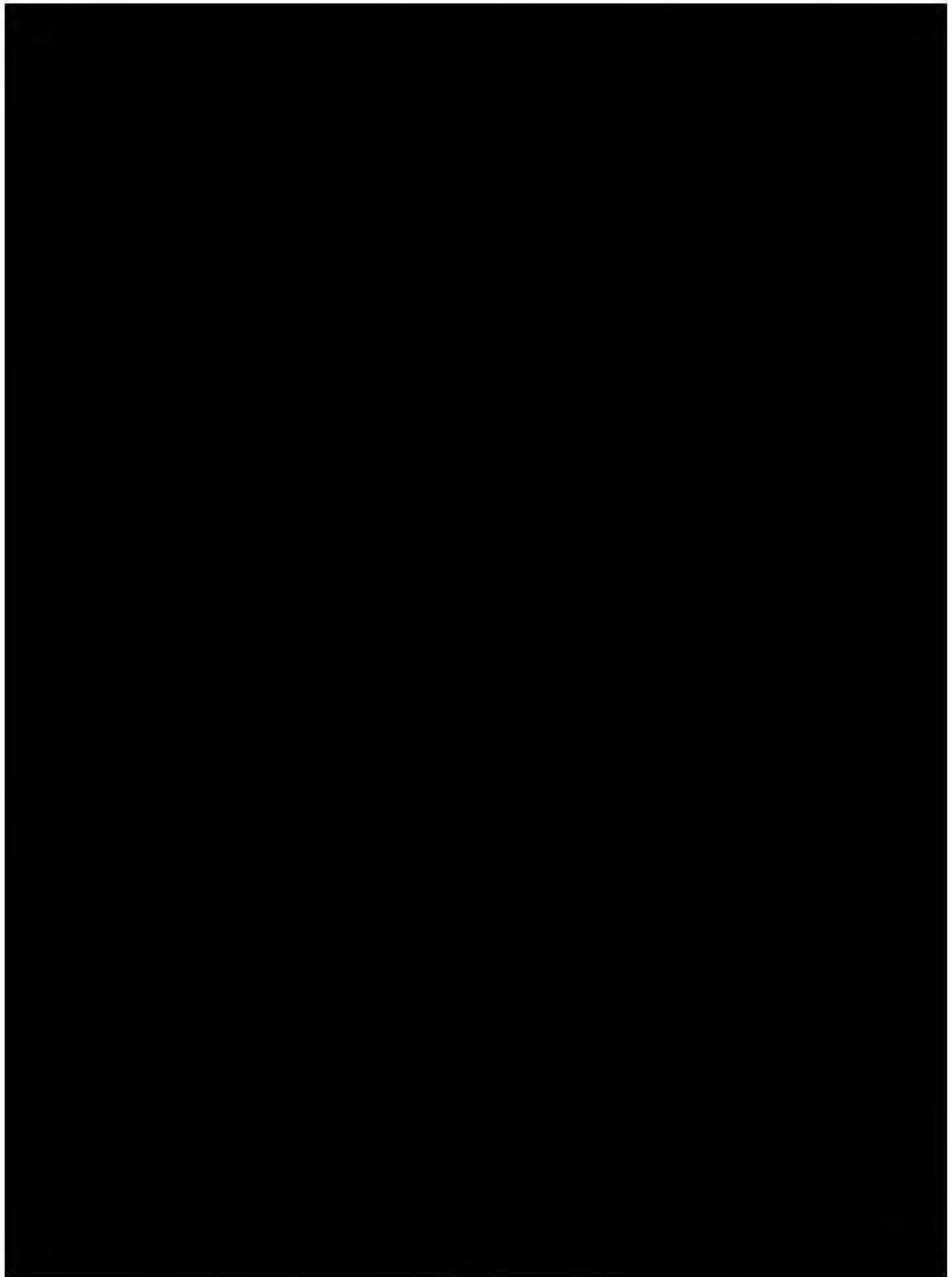


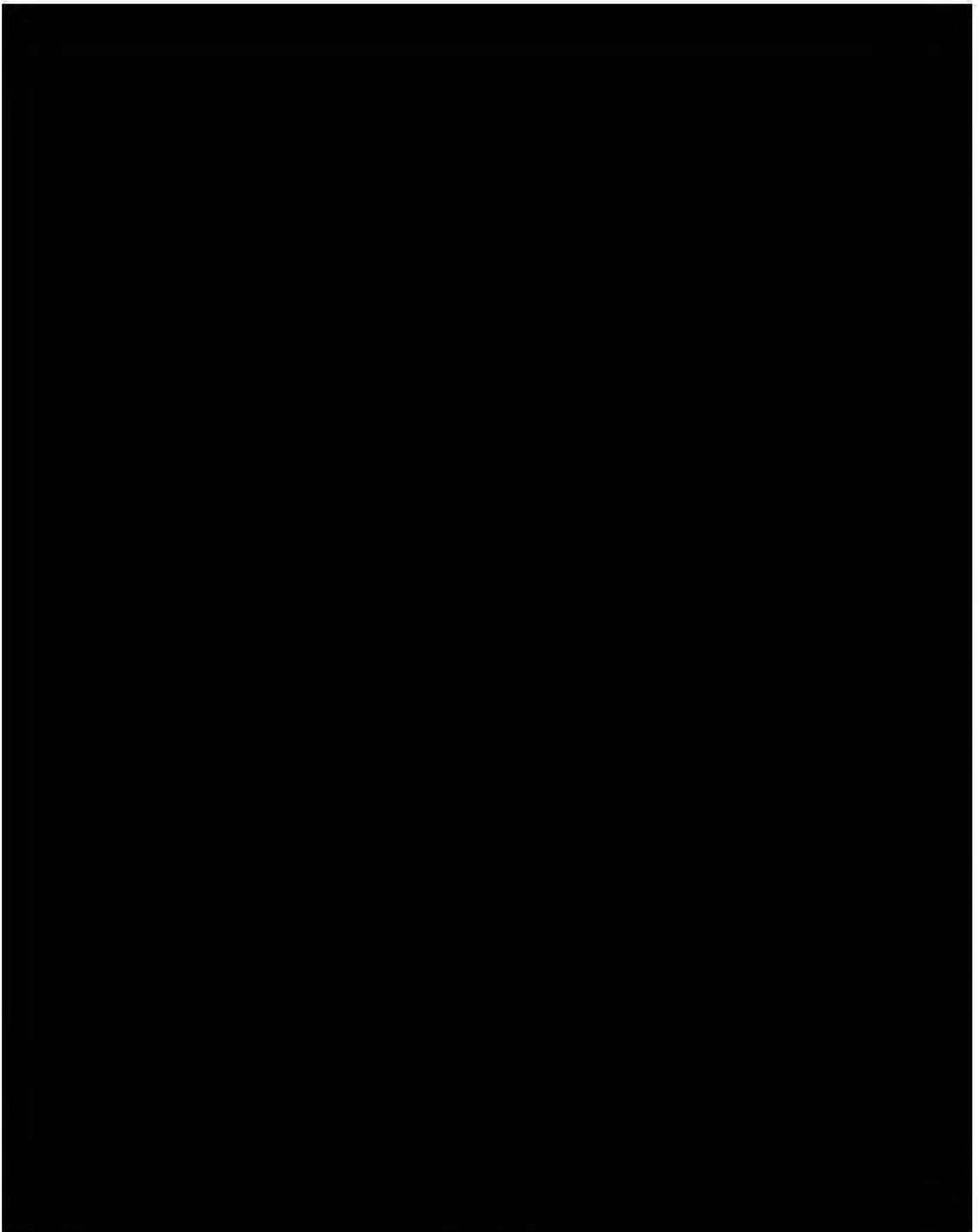


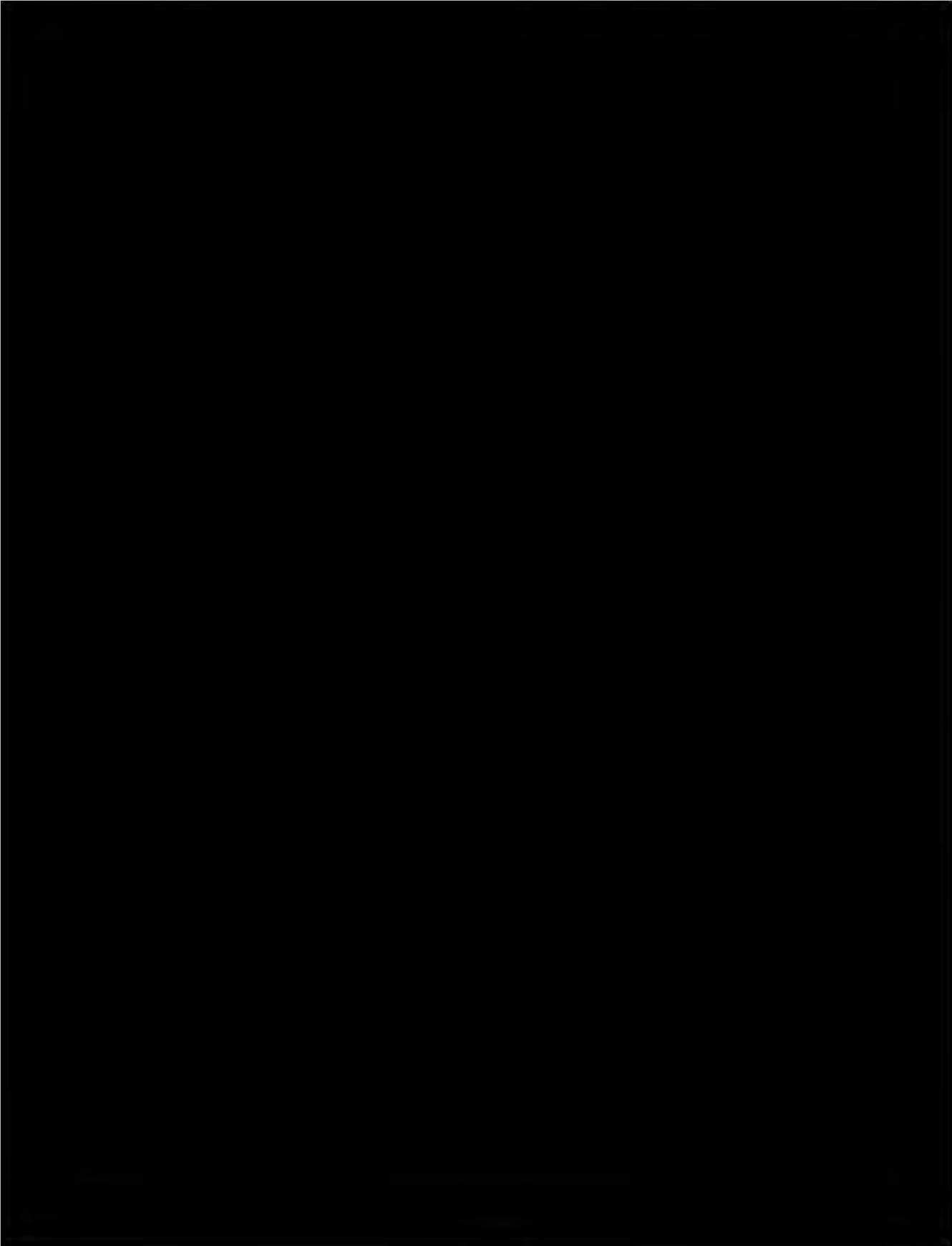


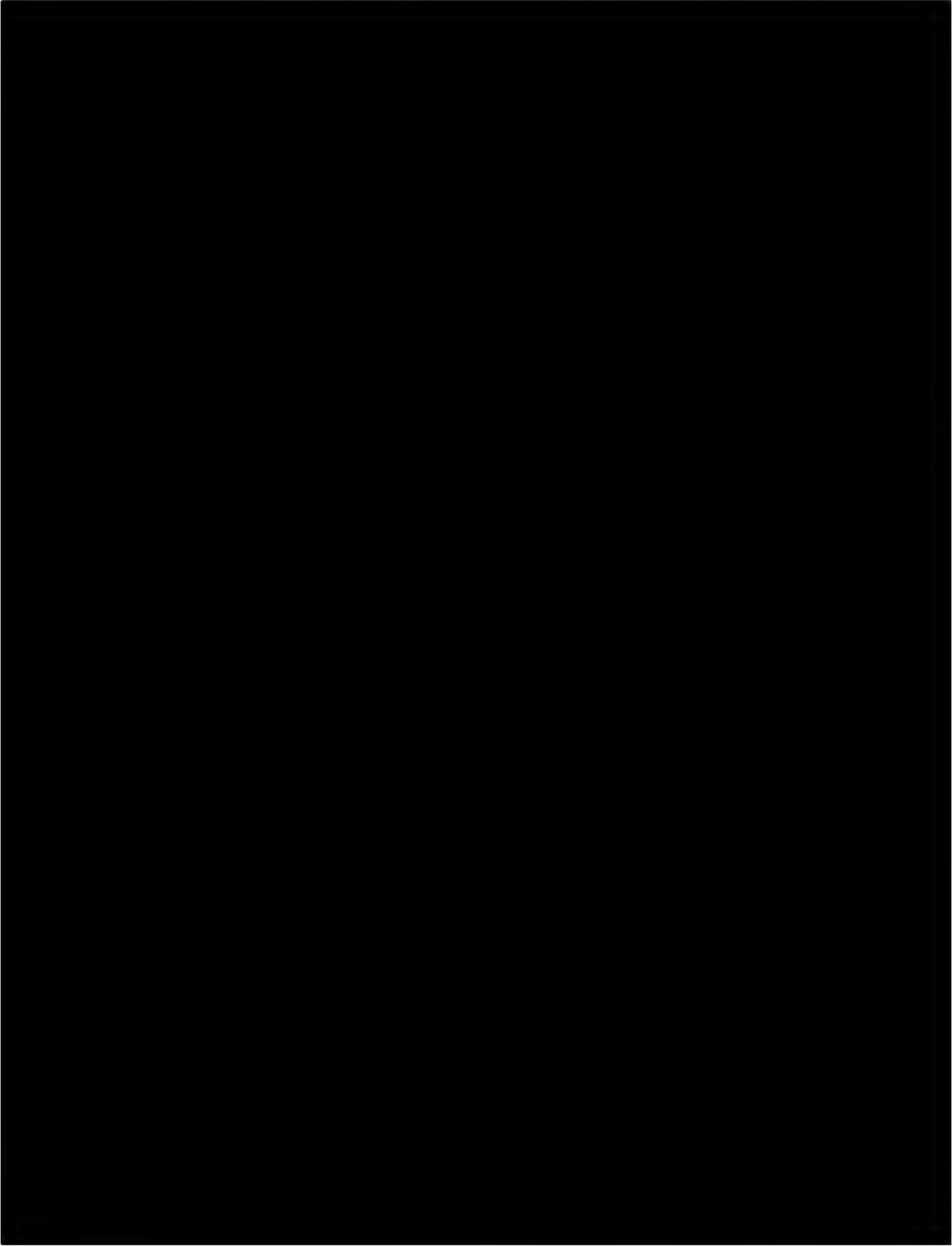


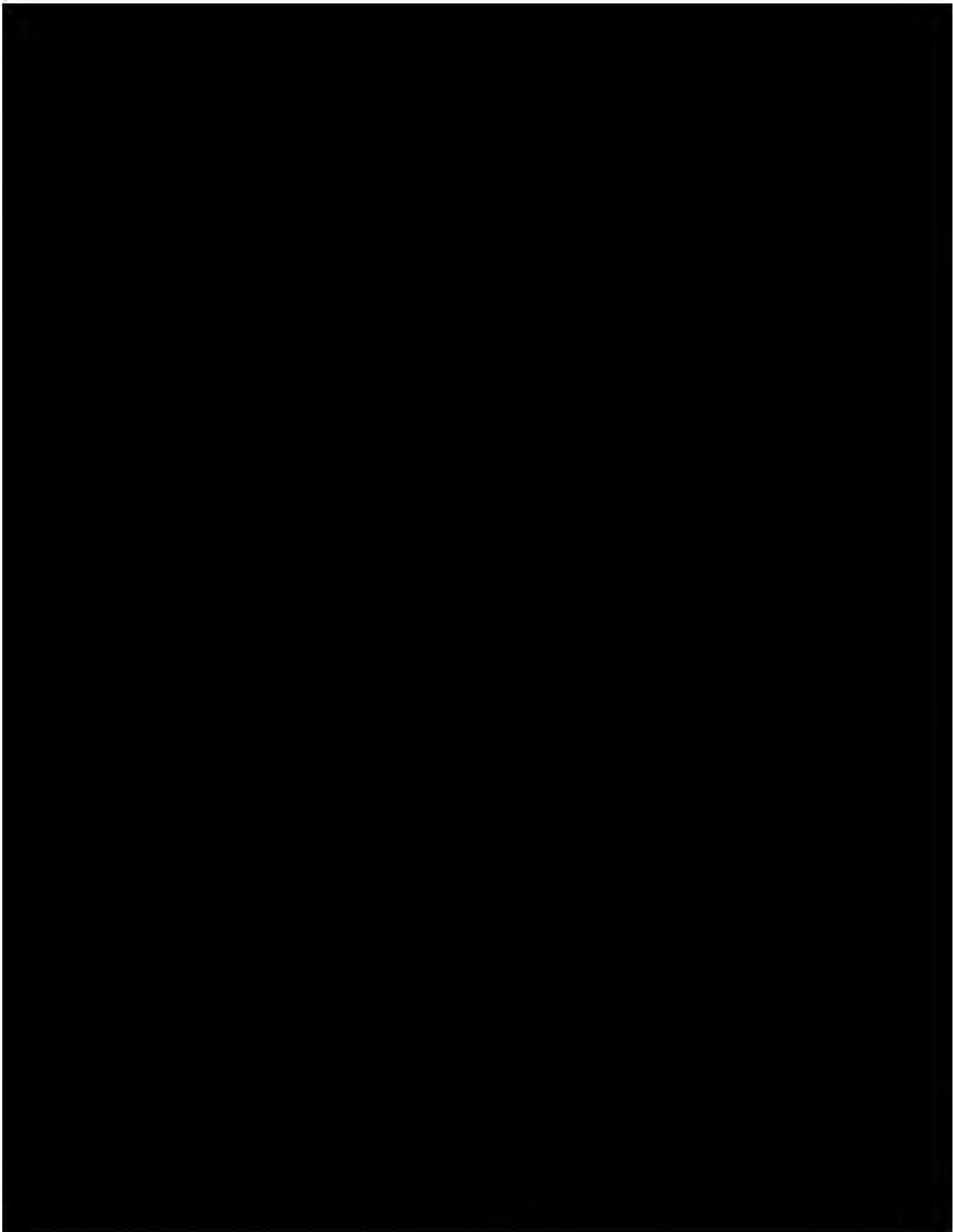


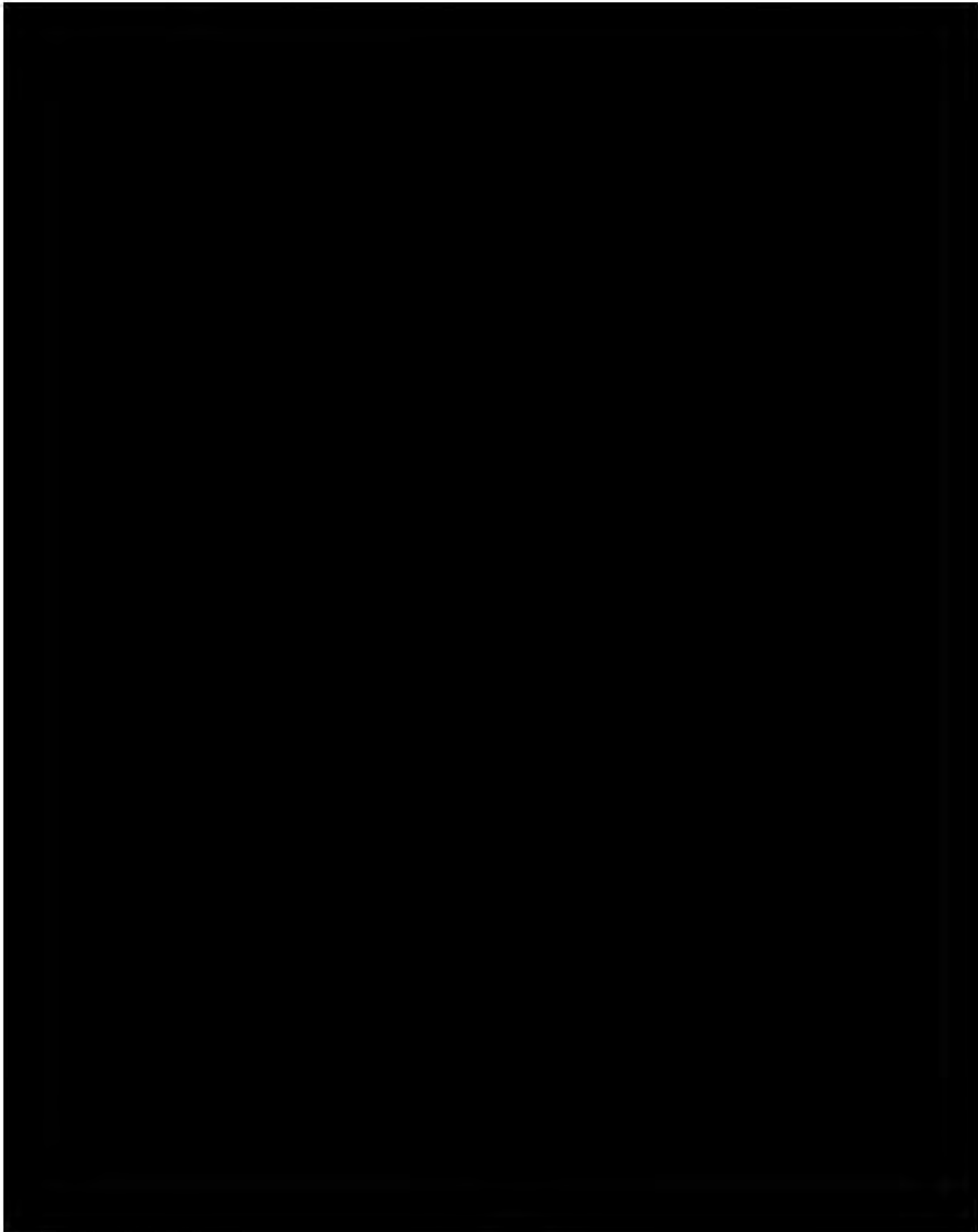


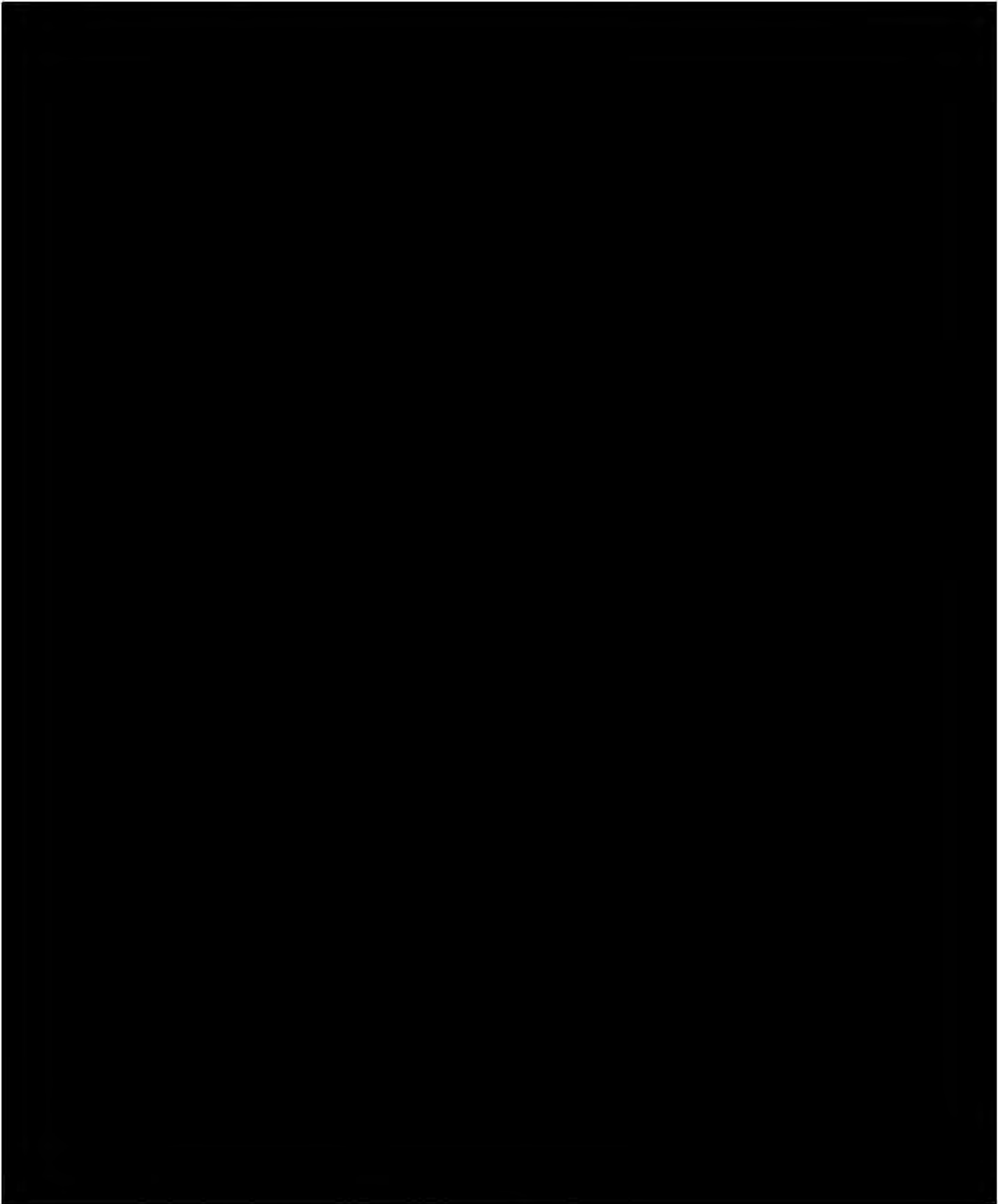


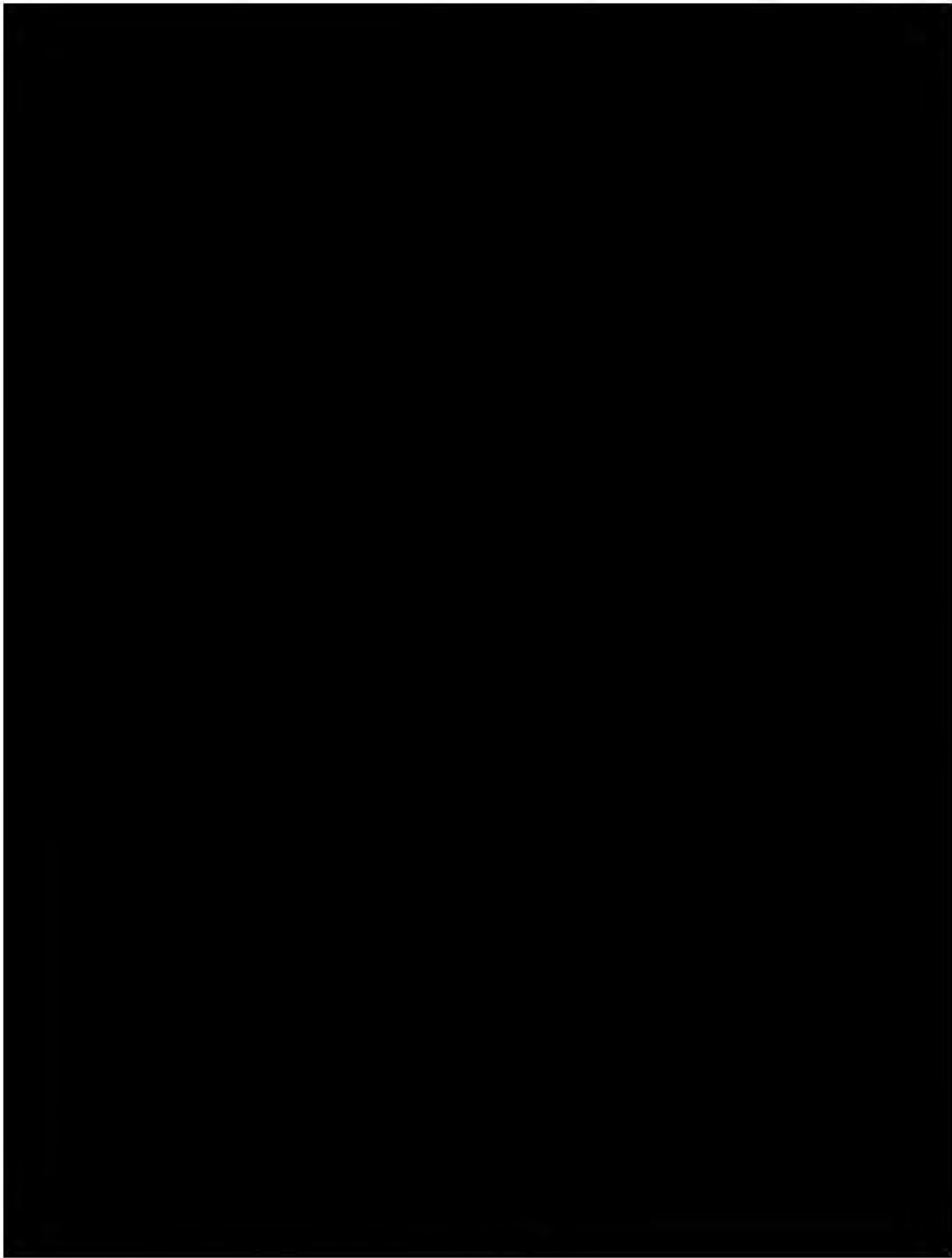


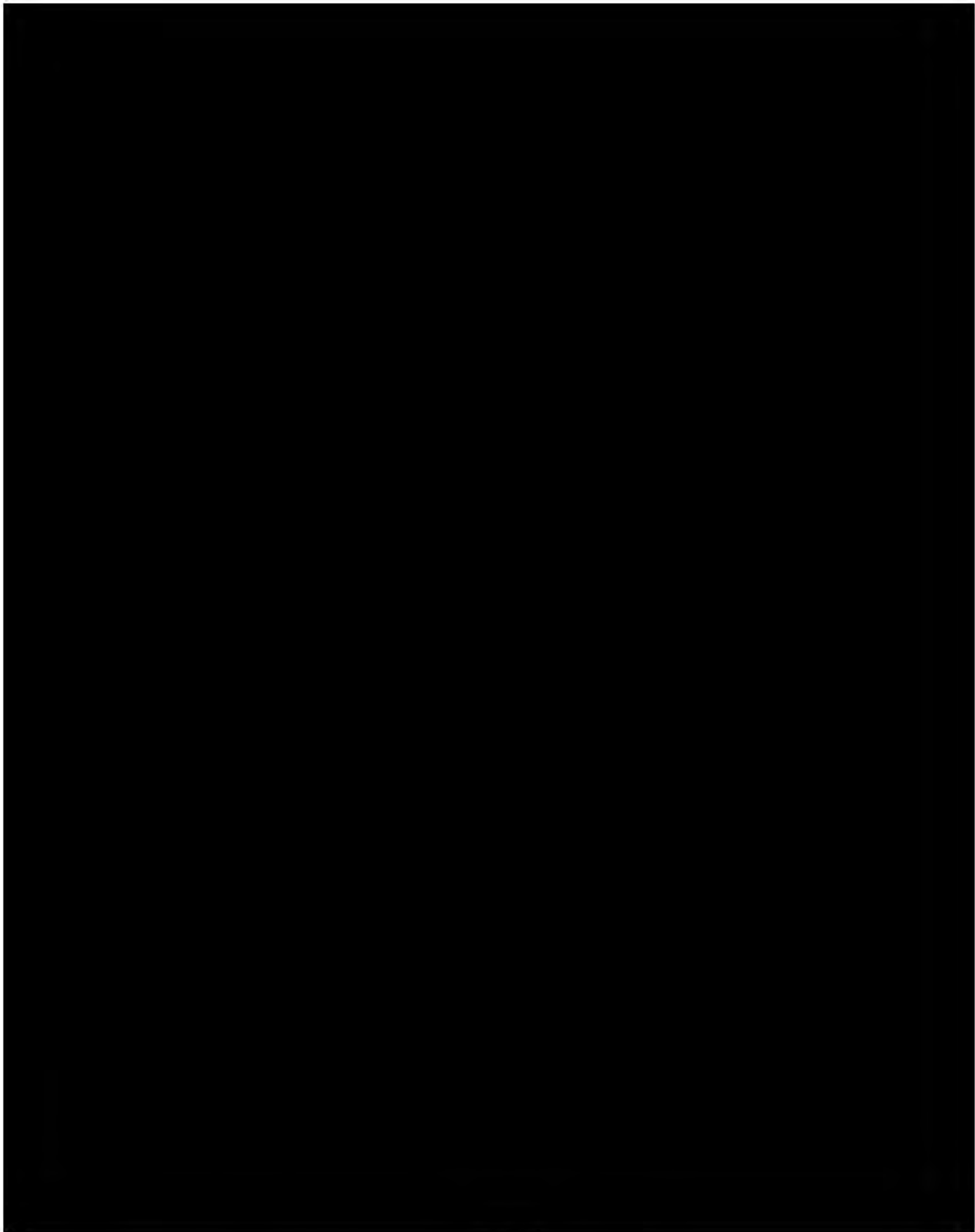


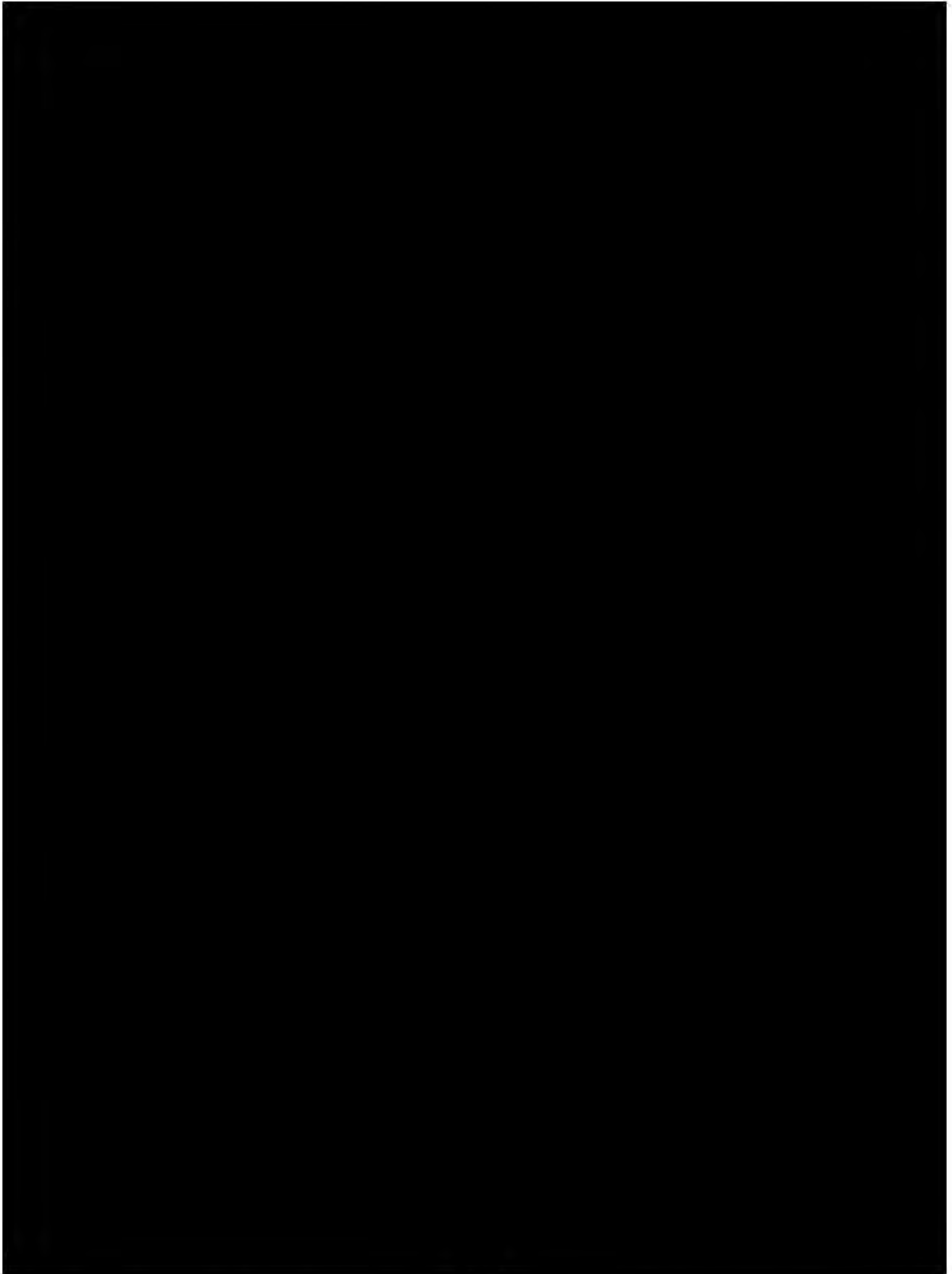


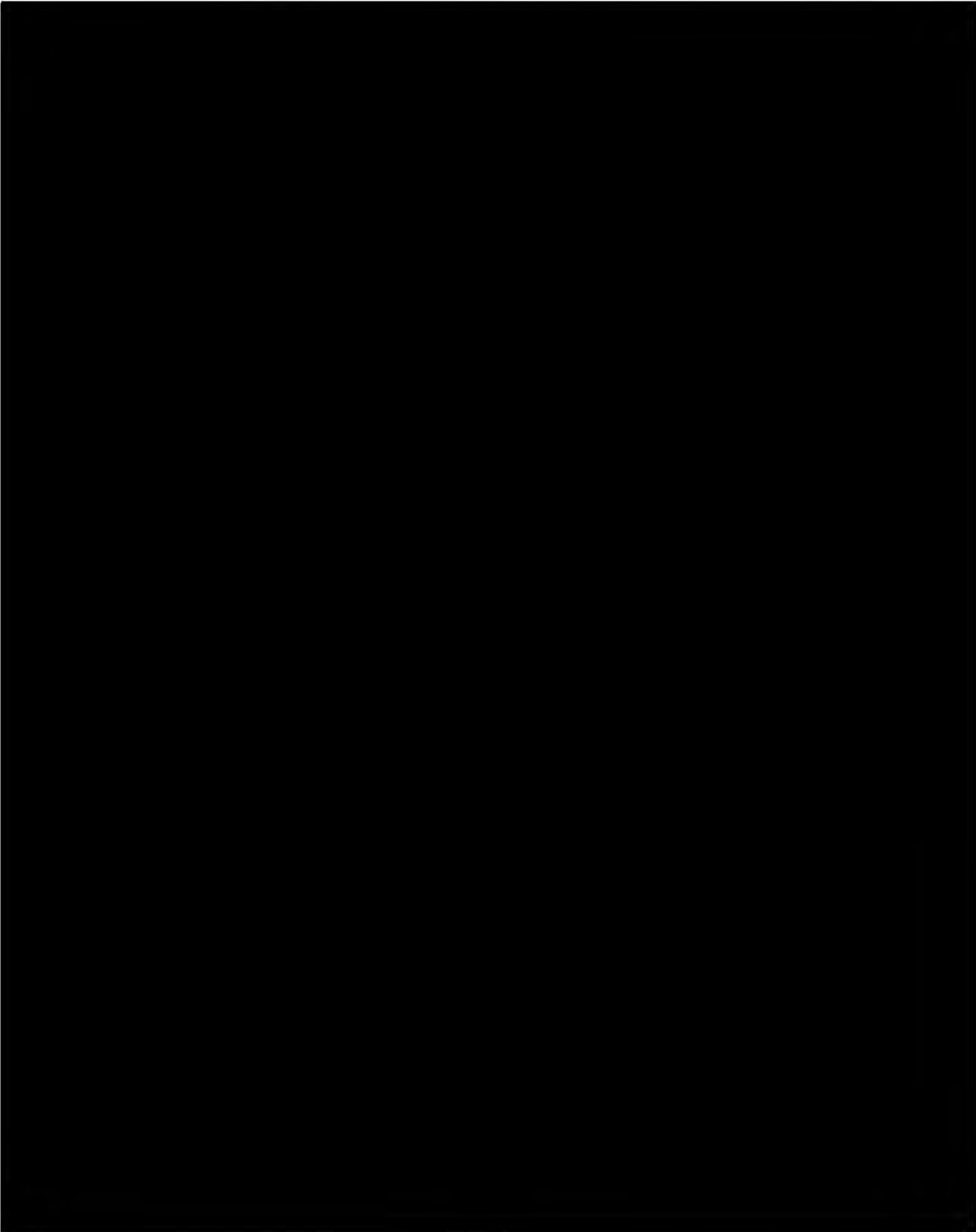


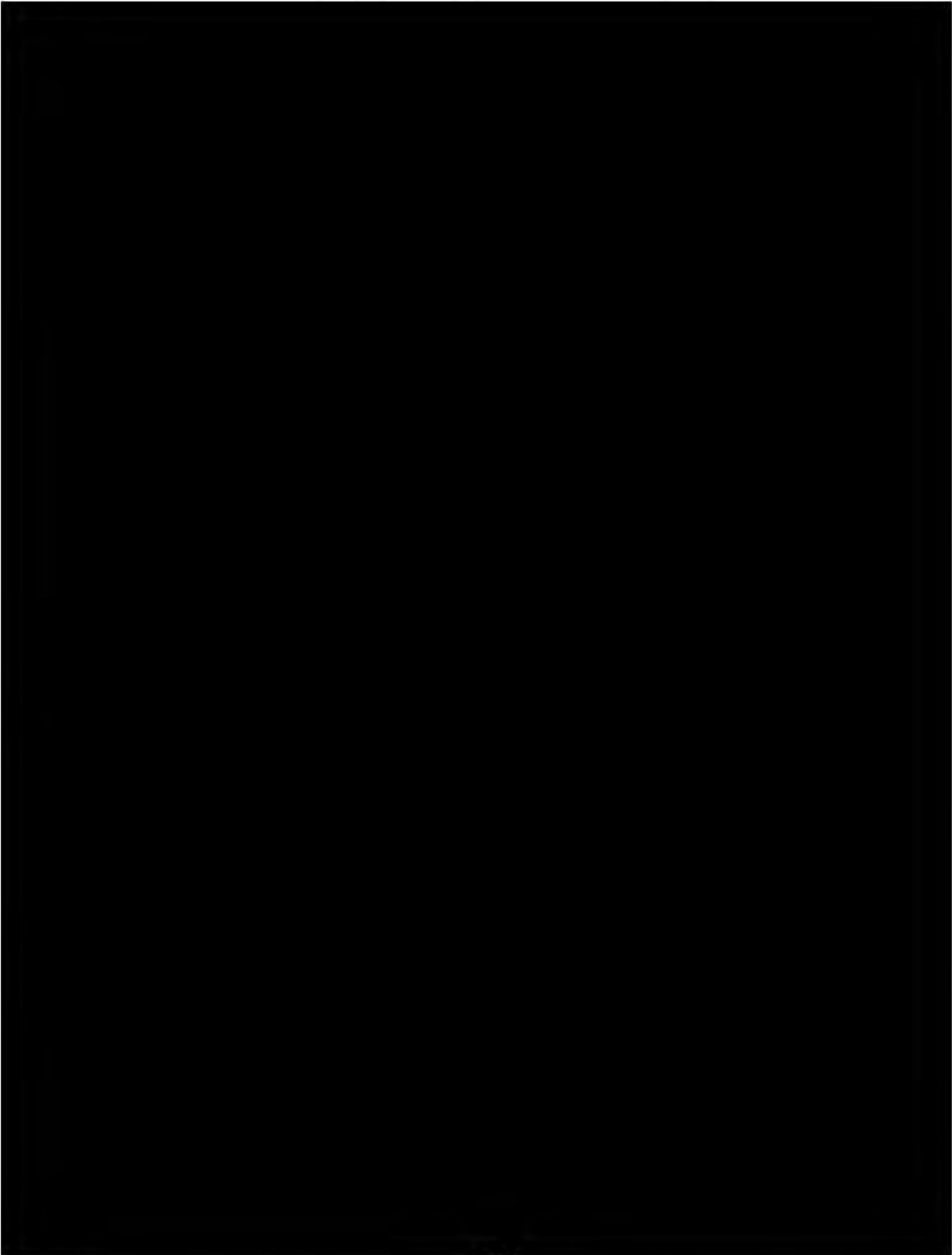


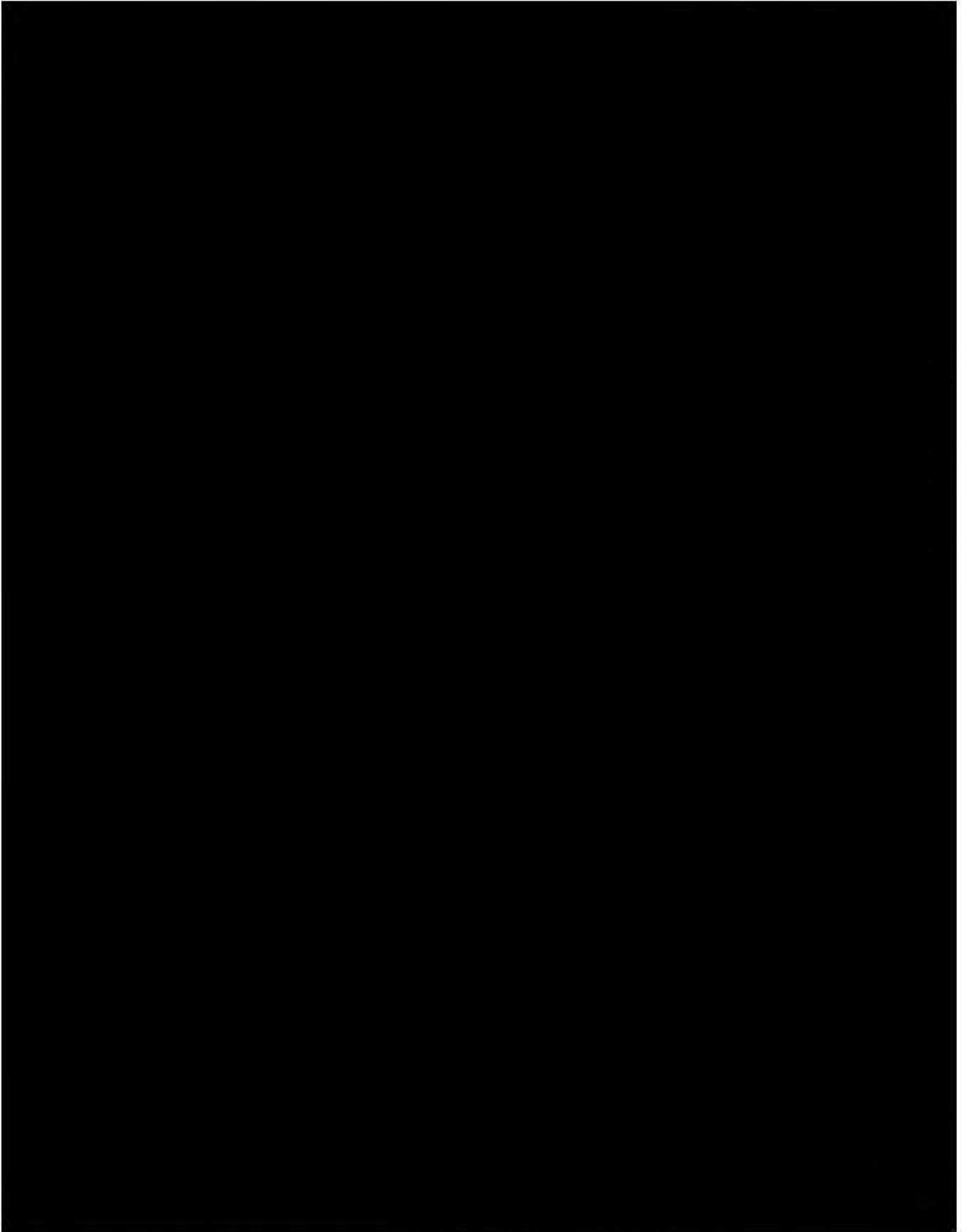


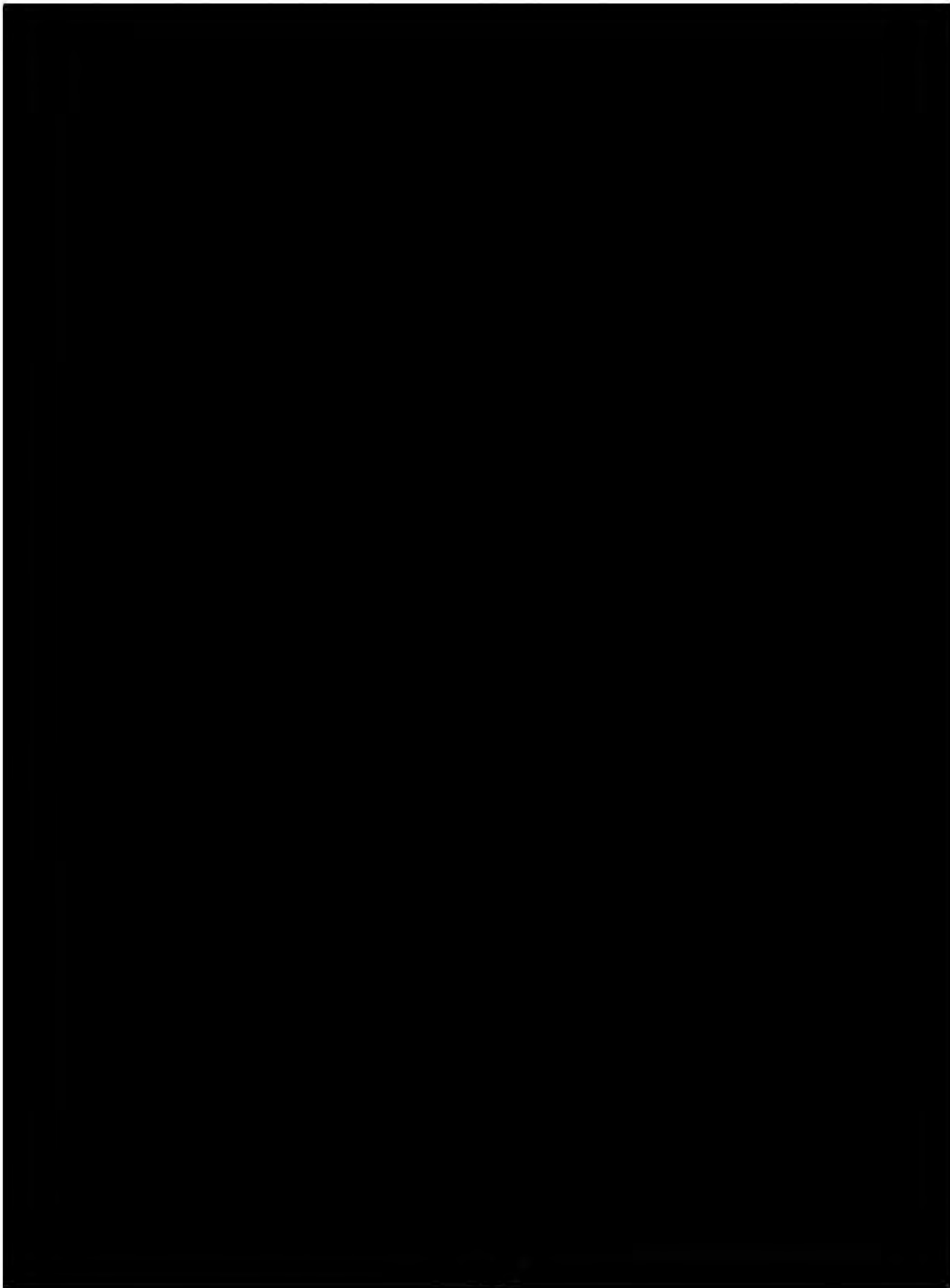


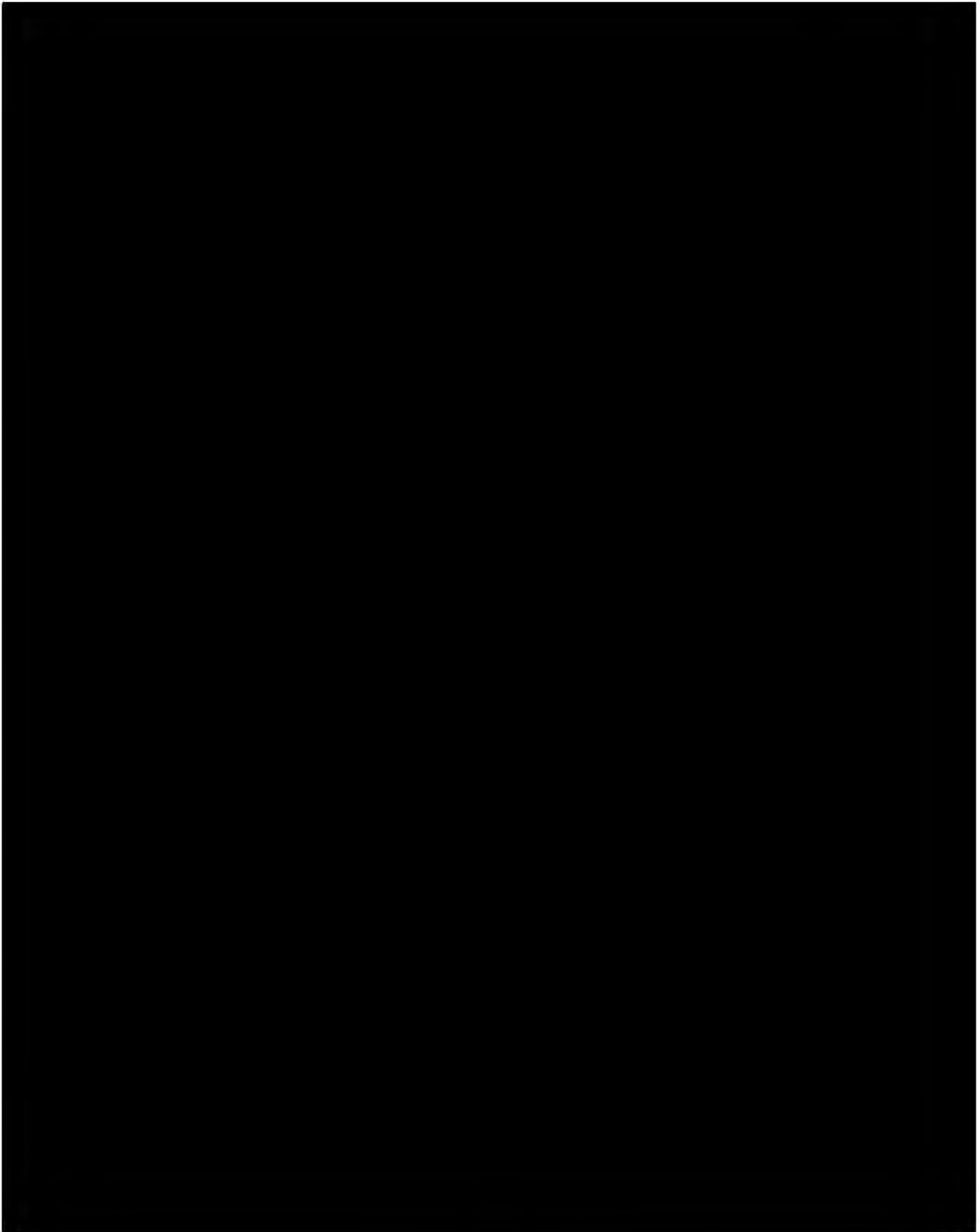


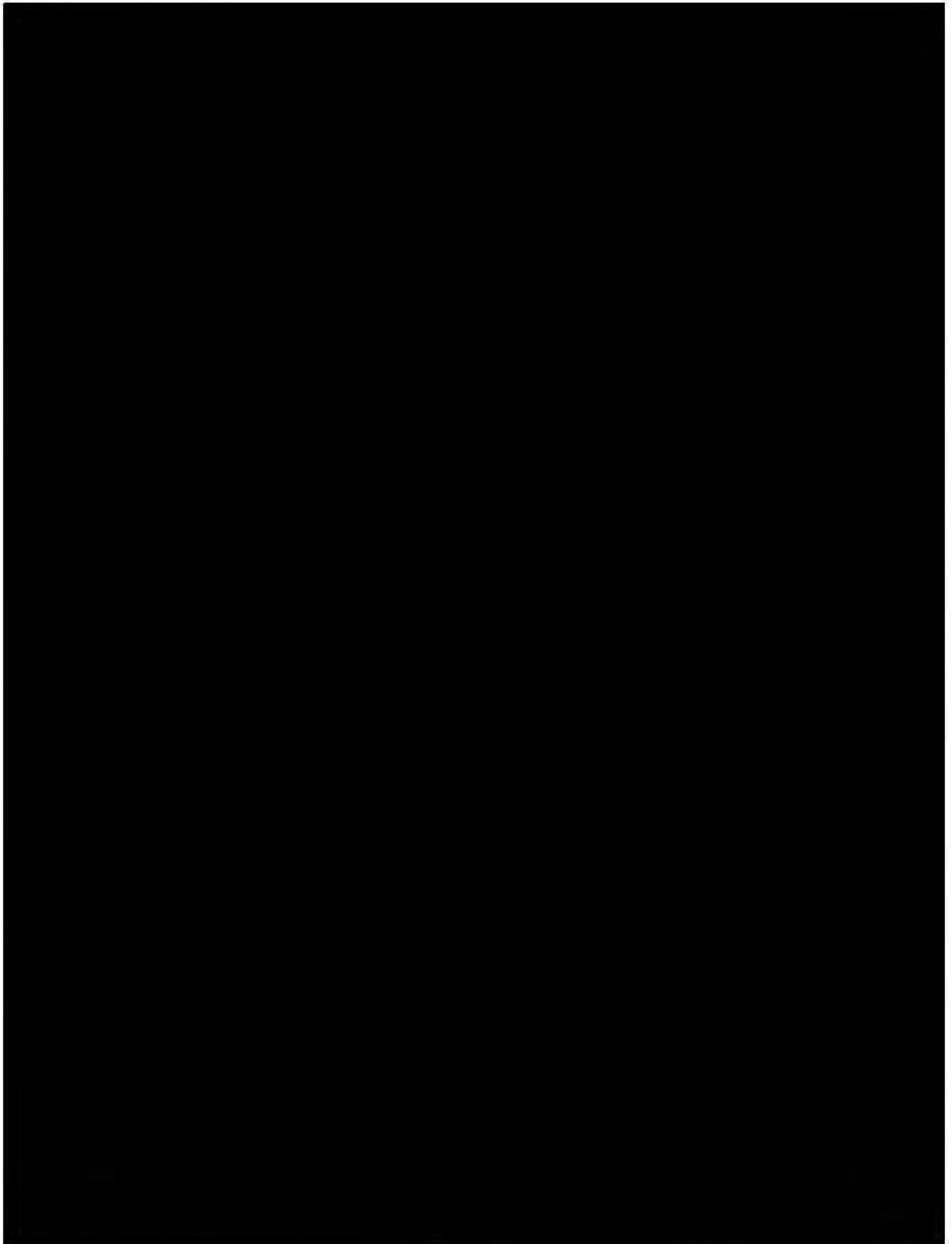


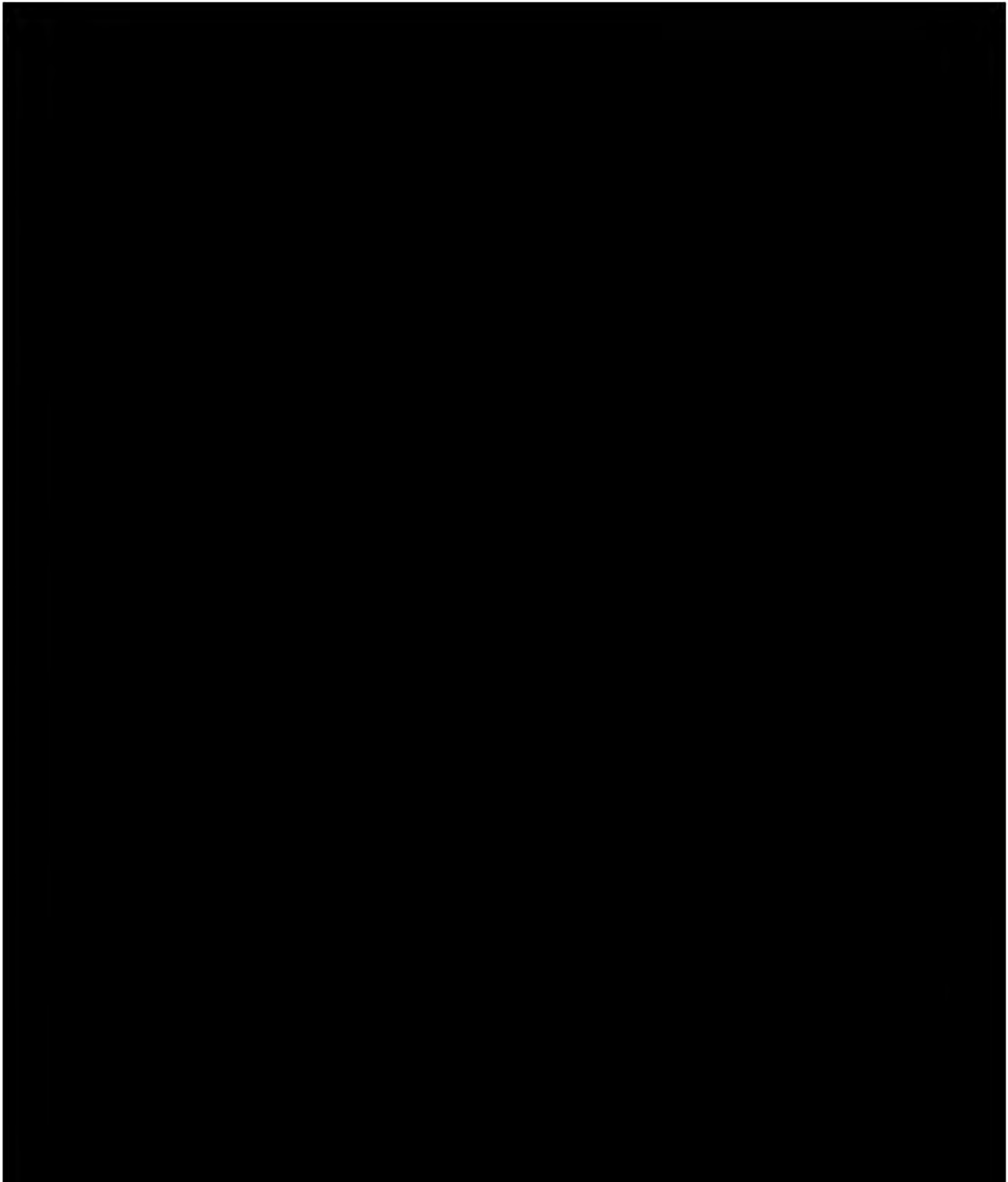












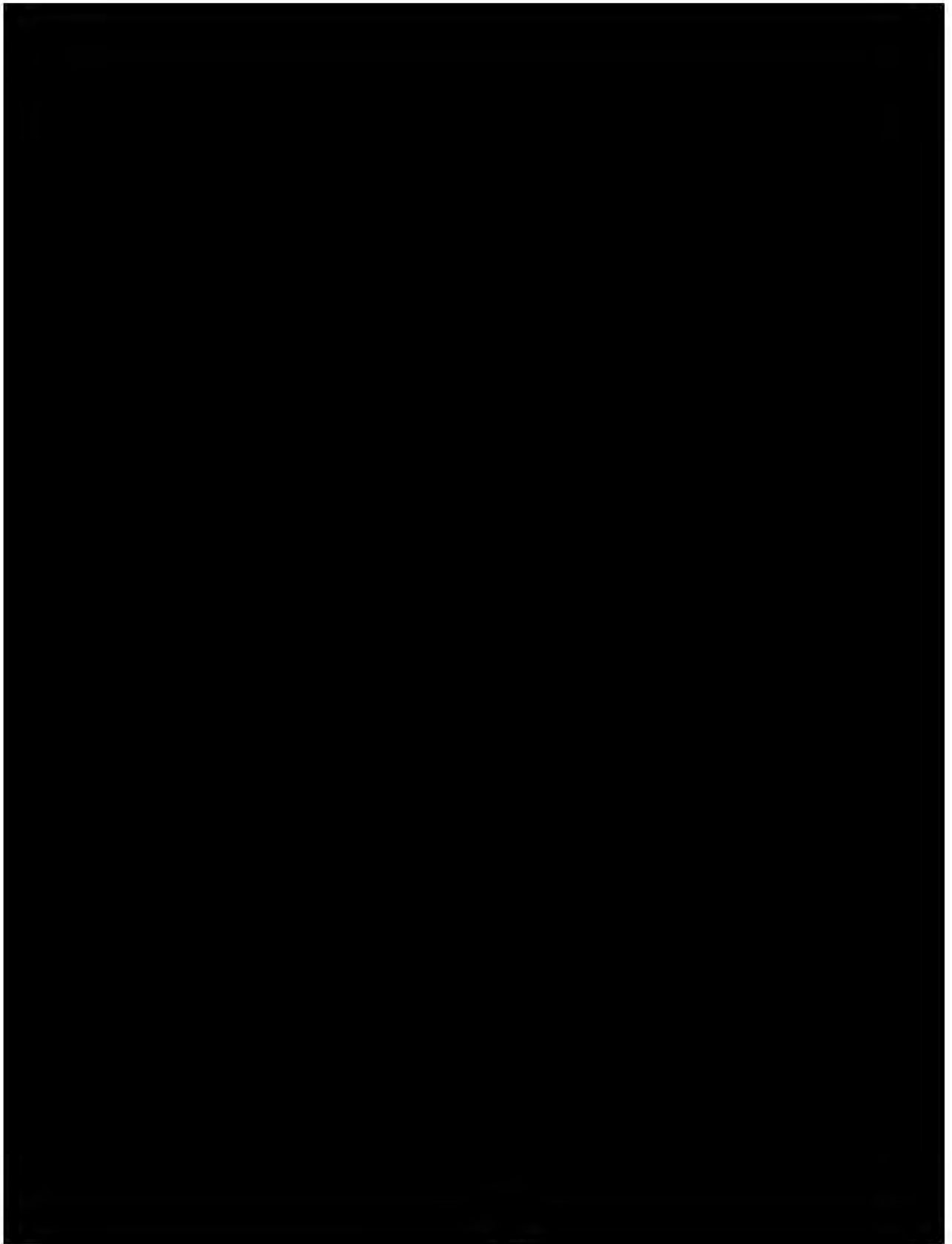




EXHIBIT 2 – REDACTED

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San Francisco, CA 94111-1809
11 Telephone: 415 391 5400
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12 Attorneys for Claimant
13 GOOGLE LLC

14 BEFORE JAMS (JUDICIAL ARBITRATION AND MEDIATION SERVICES)

15
16 GOOGLE LLC,

17 Claimant,

18 v.

19 ANTHONY LEVANDOWSKI and
LIOR RON,

20 Respondents.
21
22

JAMS Reference No. 1100086069
(consolidated)

**GOOGLE LLC'S RESPONSE TO
RESPONDENTS' MOTION FOR OFFSET**

23 **CONTAINS INFORMATION DESIGNATED**
24 **CONFIDENTIAL AND HIGHLY CONFIDENTIAL (OUTSIDE COUNSEL ONLY)**
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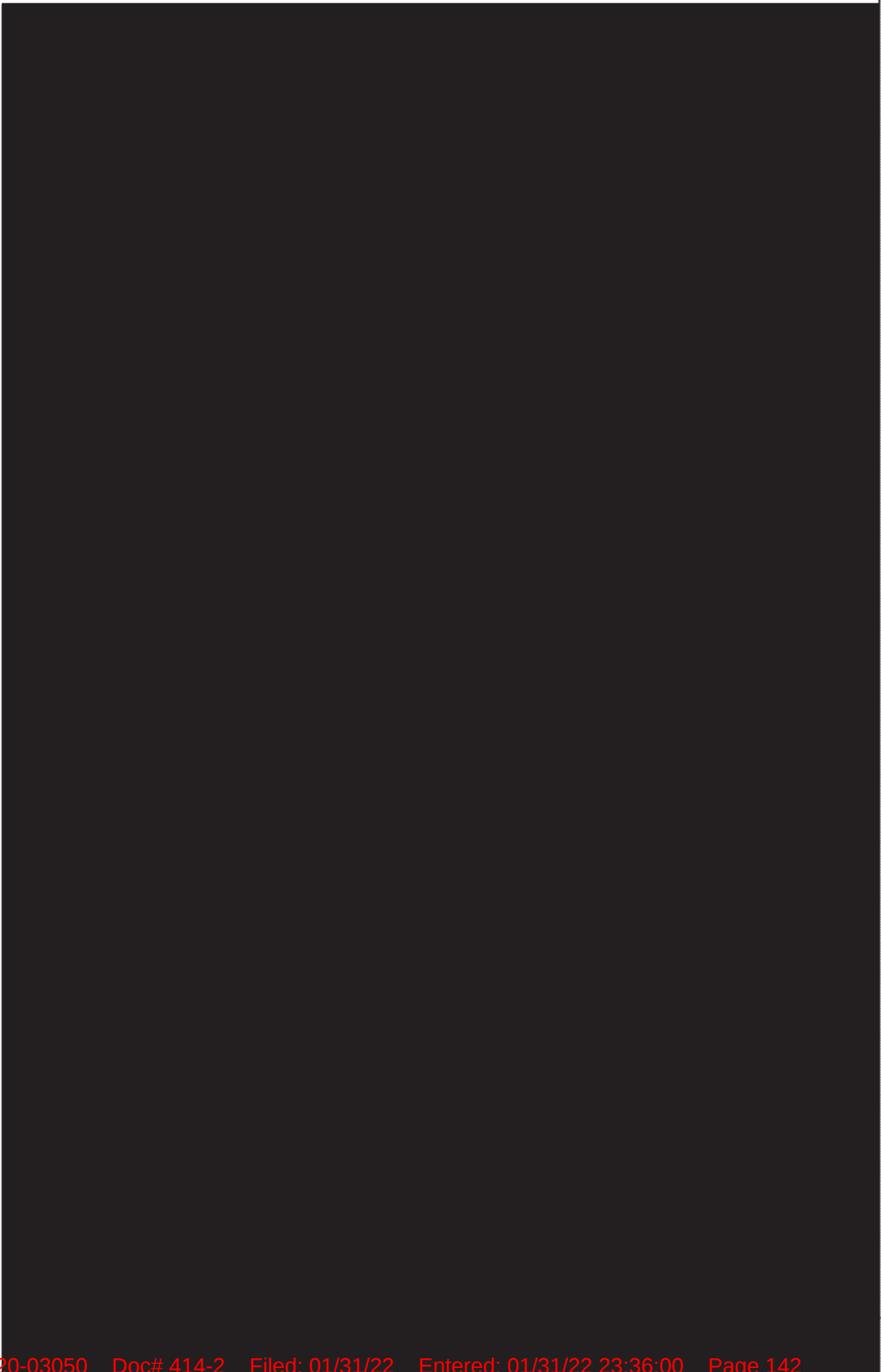
GOOGLE LLC'S RESPONSE TO RESPONDENTS' MOTION FOR OFFSET

Reference No. 1100086069

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EXHIBIT 3 – REDACTED

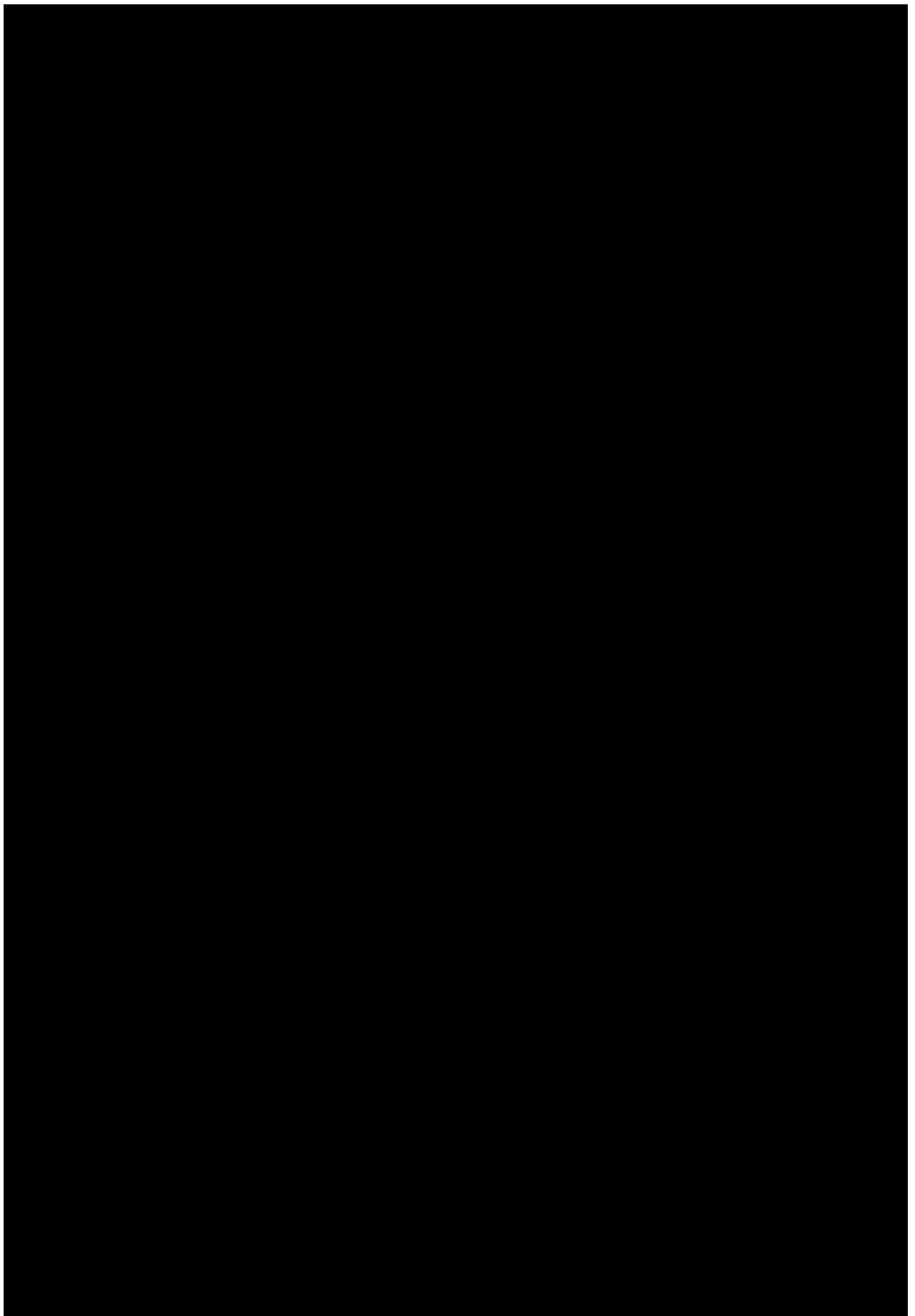
*** HIGHLY CONFIDENTIAL -- ATTORNEYS' EYES ONLY ***
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE:) Bankruptcy Case
ANTHONY SCOTT LEVANDOWSKI,) No. 20-30242 (HLB)
Debtor.) Chapter 11
_____) Adv. Pro. No.
ANTHONY LEVANDOWSKI, an) 20-03050 (HLB)
individual,)
Plaintiff,)
v.)
UBER TECHNOLOGIES, INC.,)
Defendant.)
_____)

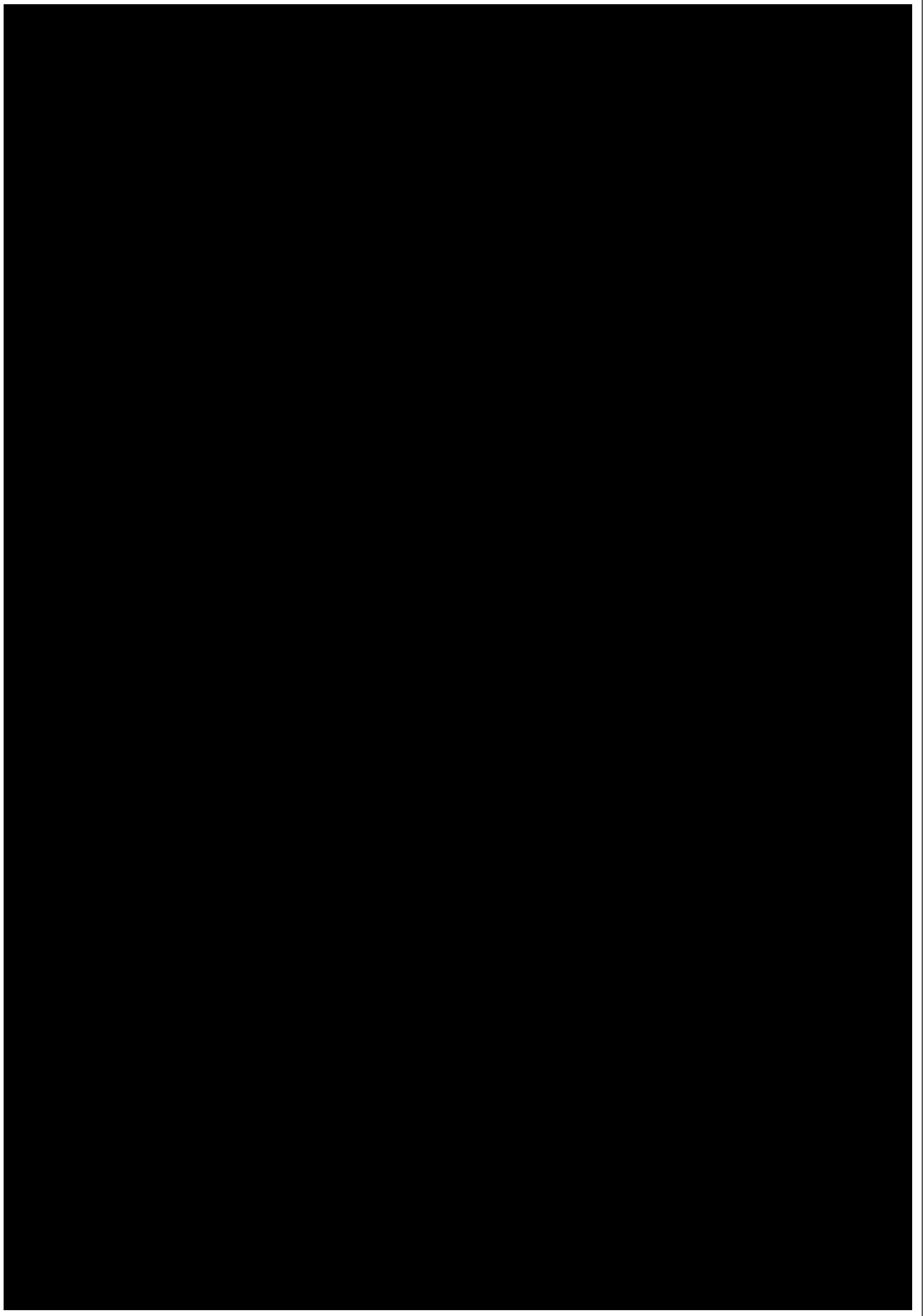
VOLUME I

The ** HIGHLY CONFIDENTIAL ** remote
videotaped deposition of ANTHONY SCOTT LEVANDOWSKI,
called for examination, taken pursuant to the Federal
Rules of Civil Procedure of the United States
Bankruptcy Courts pertaining to the taking of
depositions, taken before DINA G. MANCILLAS, a
Certified Shorthand Reporter within and for the State
of Illinois, CSR No. 84-3400 of said state, on
January 28, 2021, at 11:00 a.m. CST.

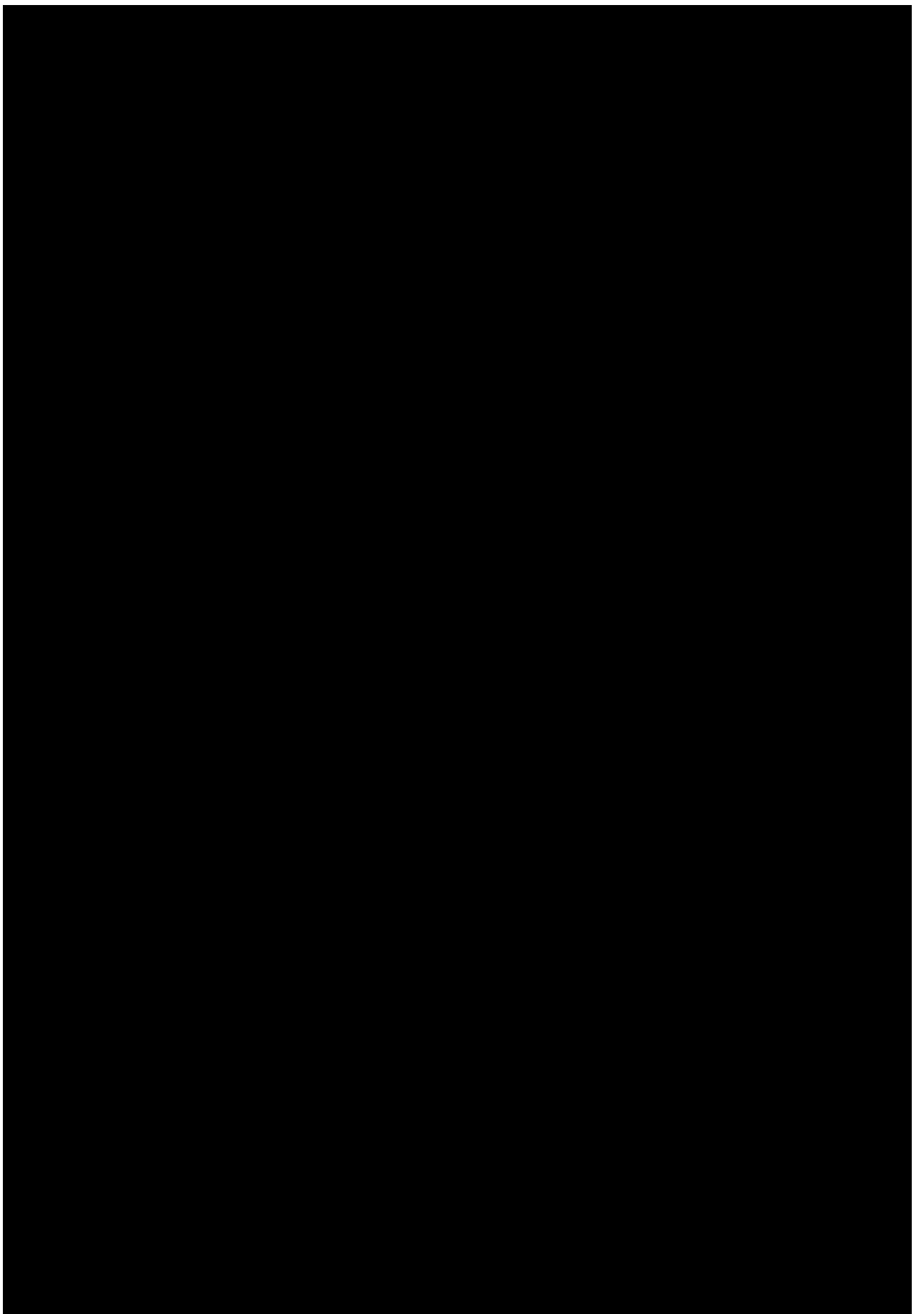
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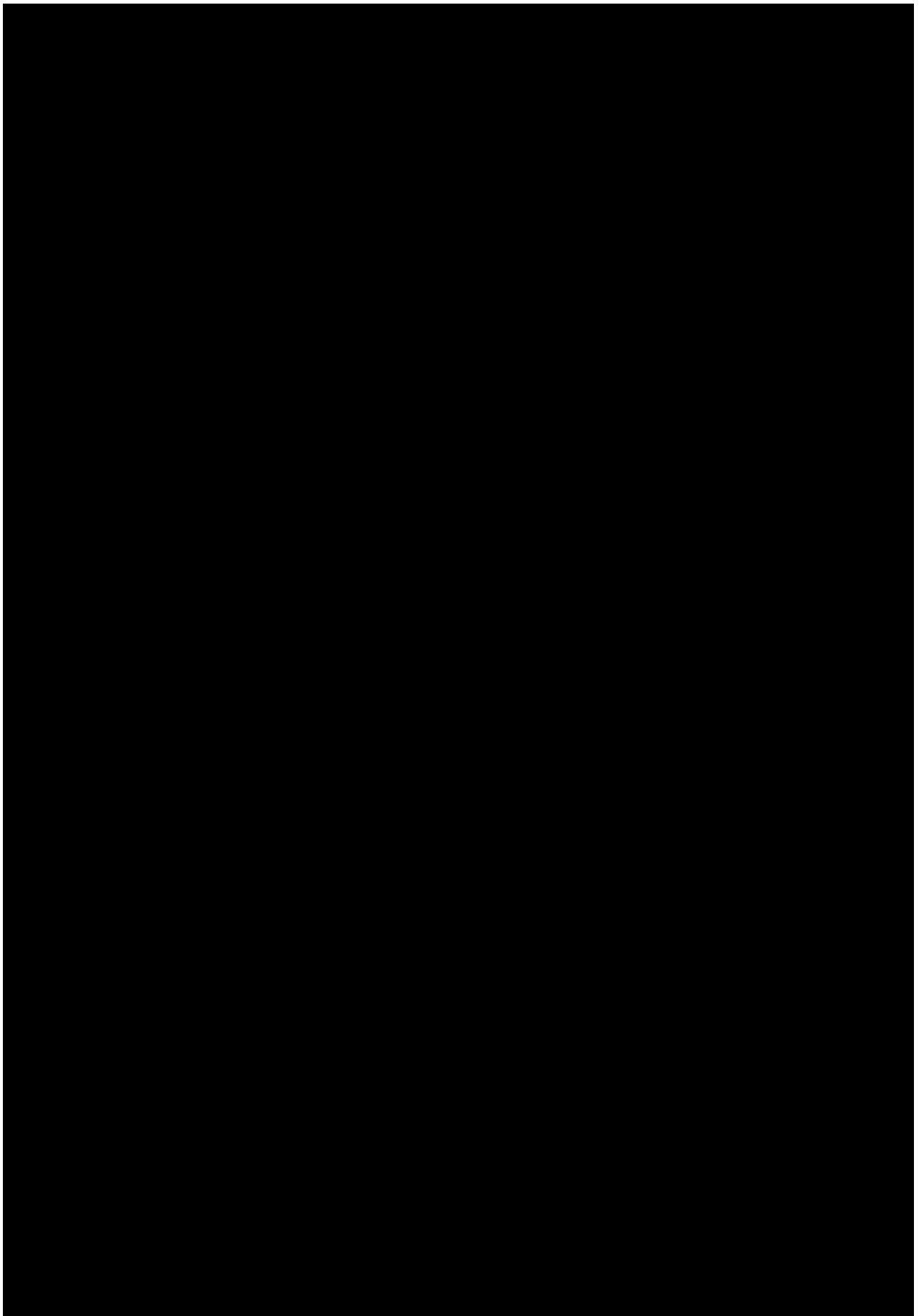
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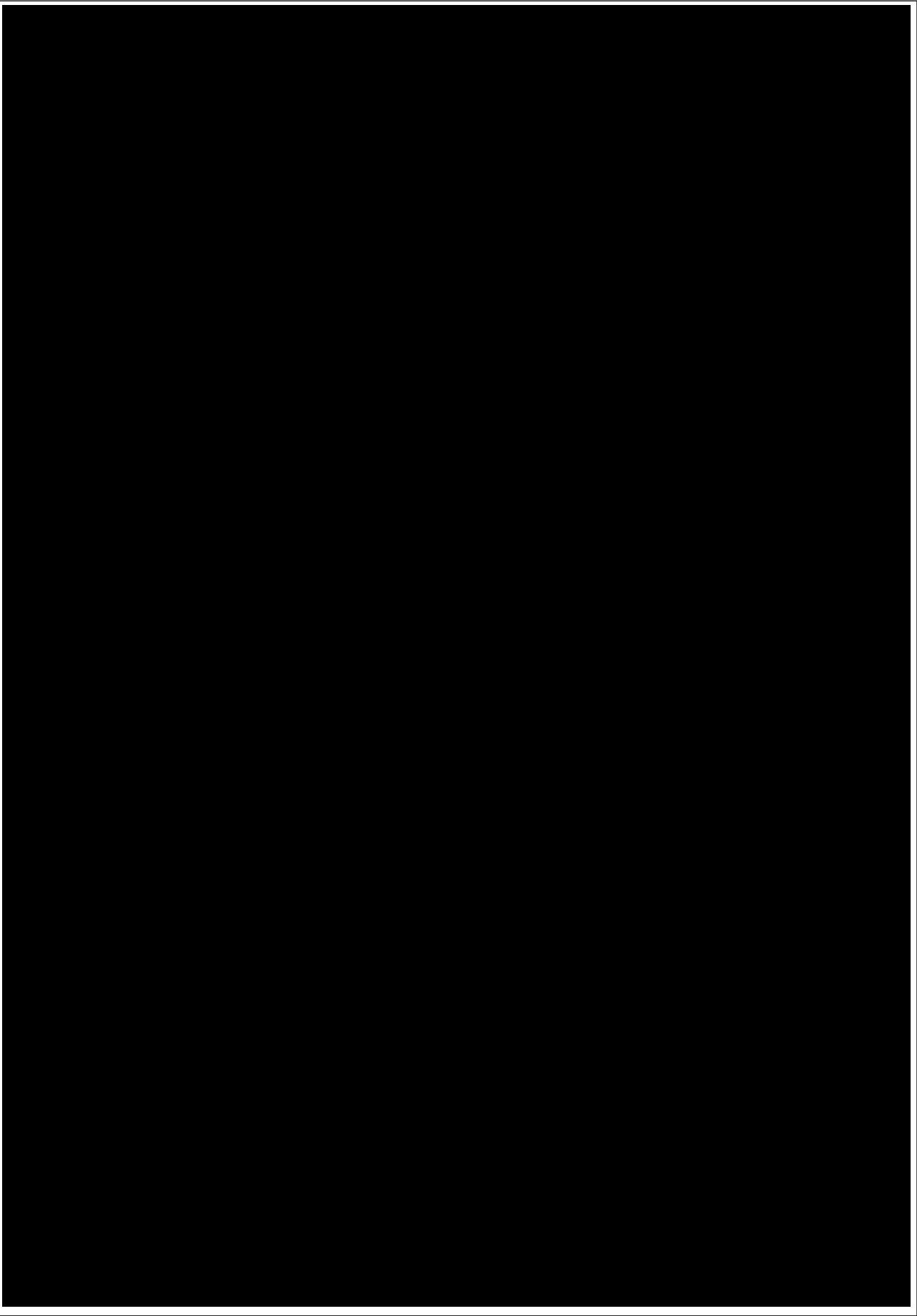
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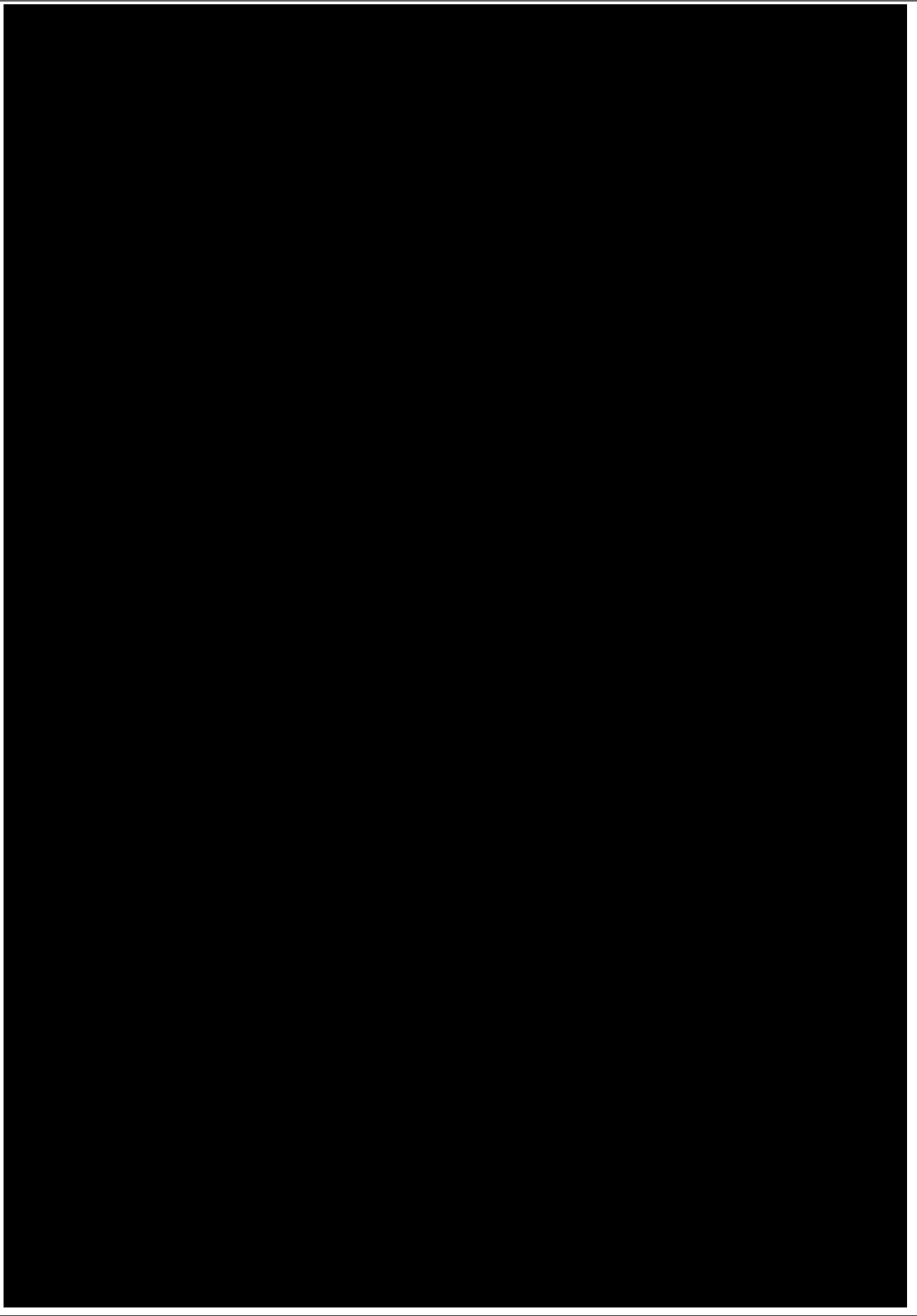
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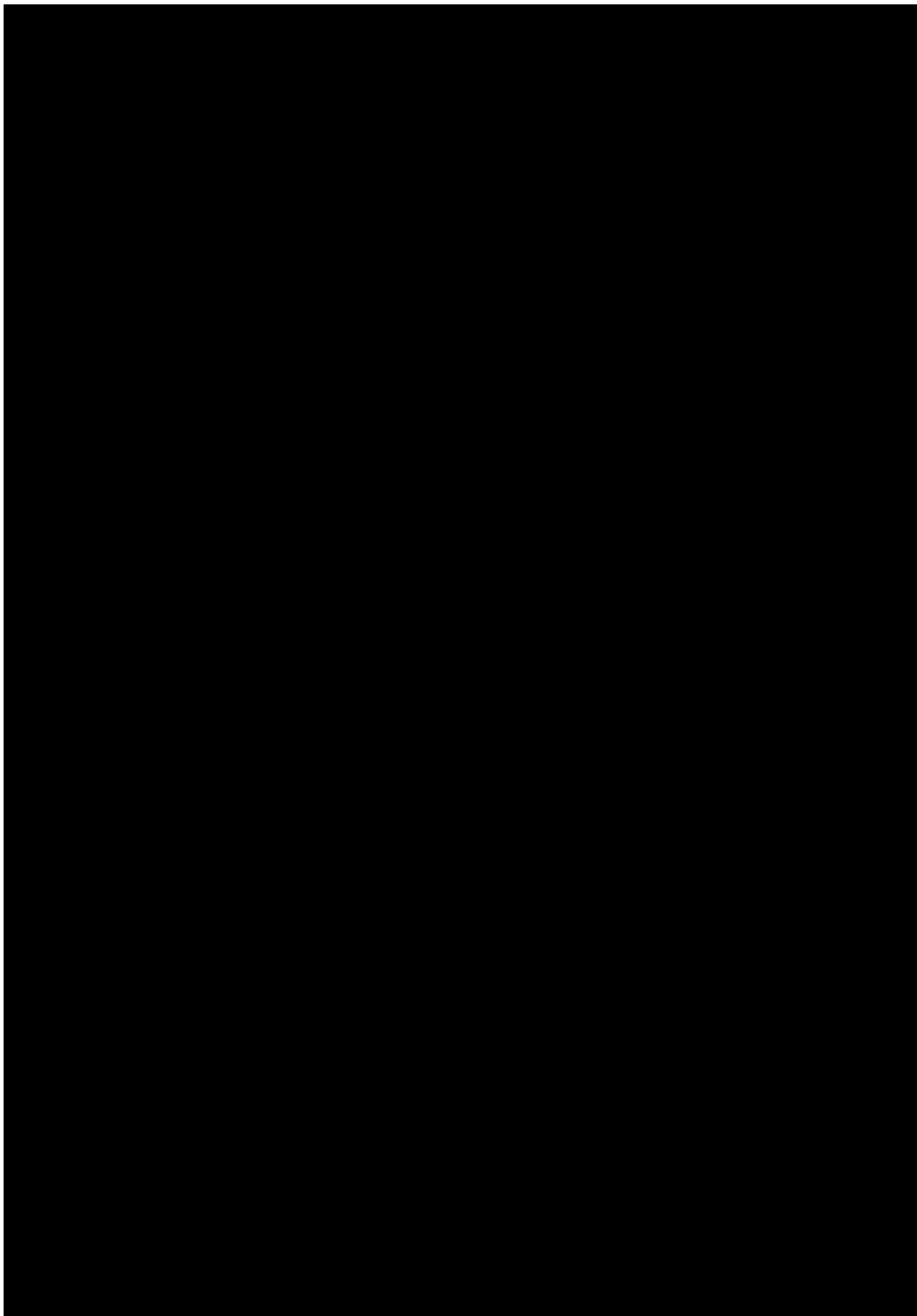
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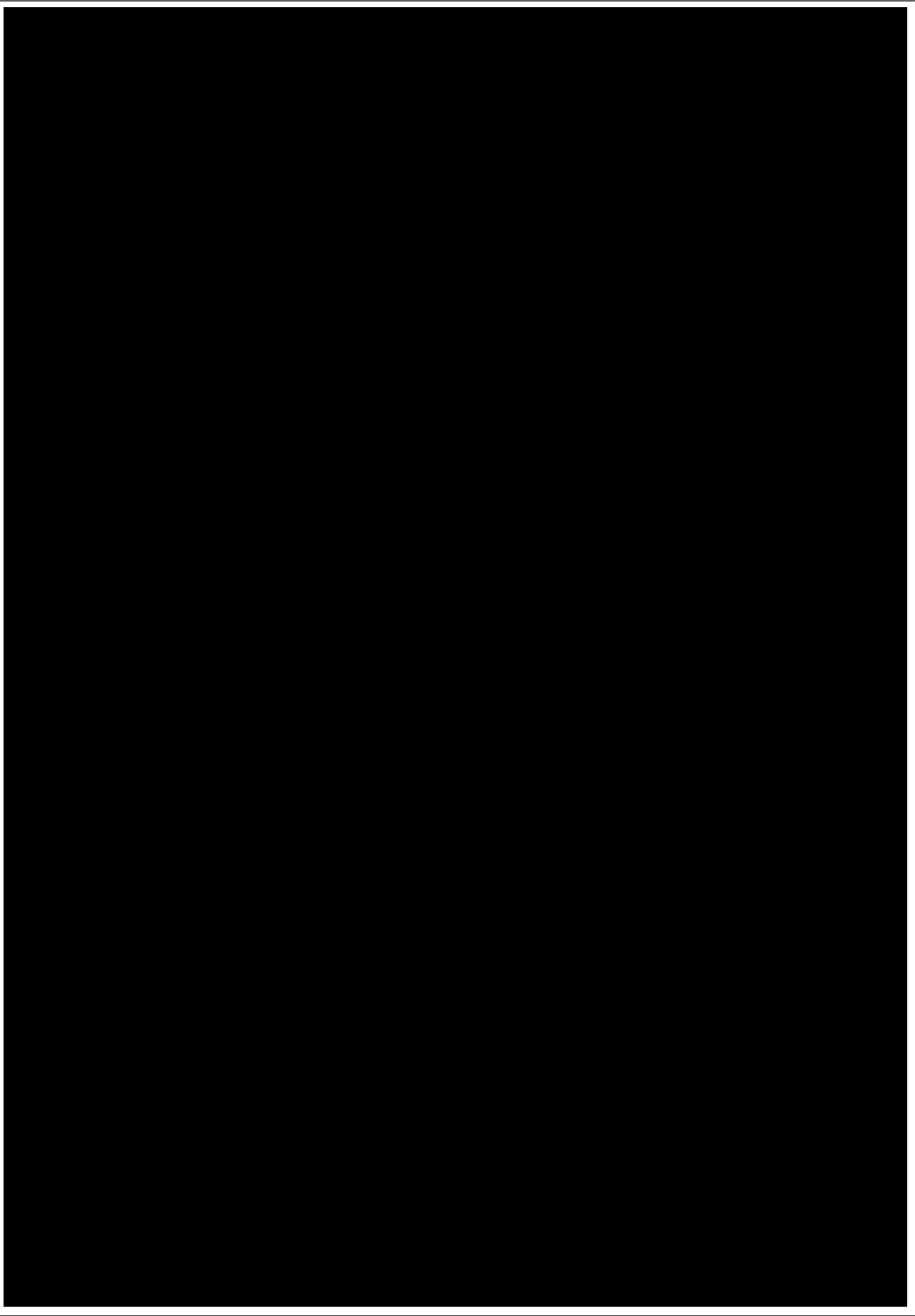
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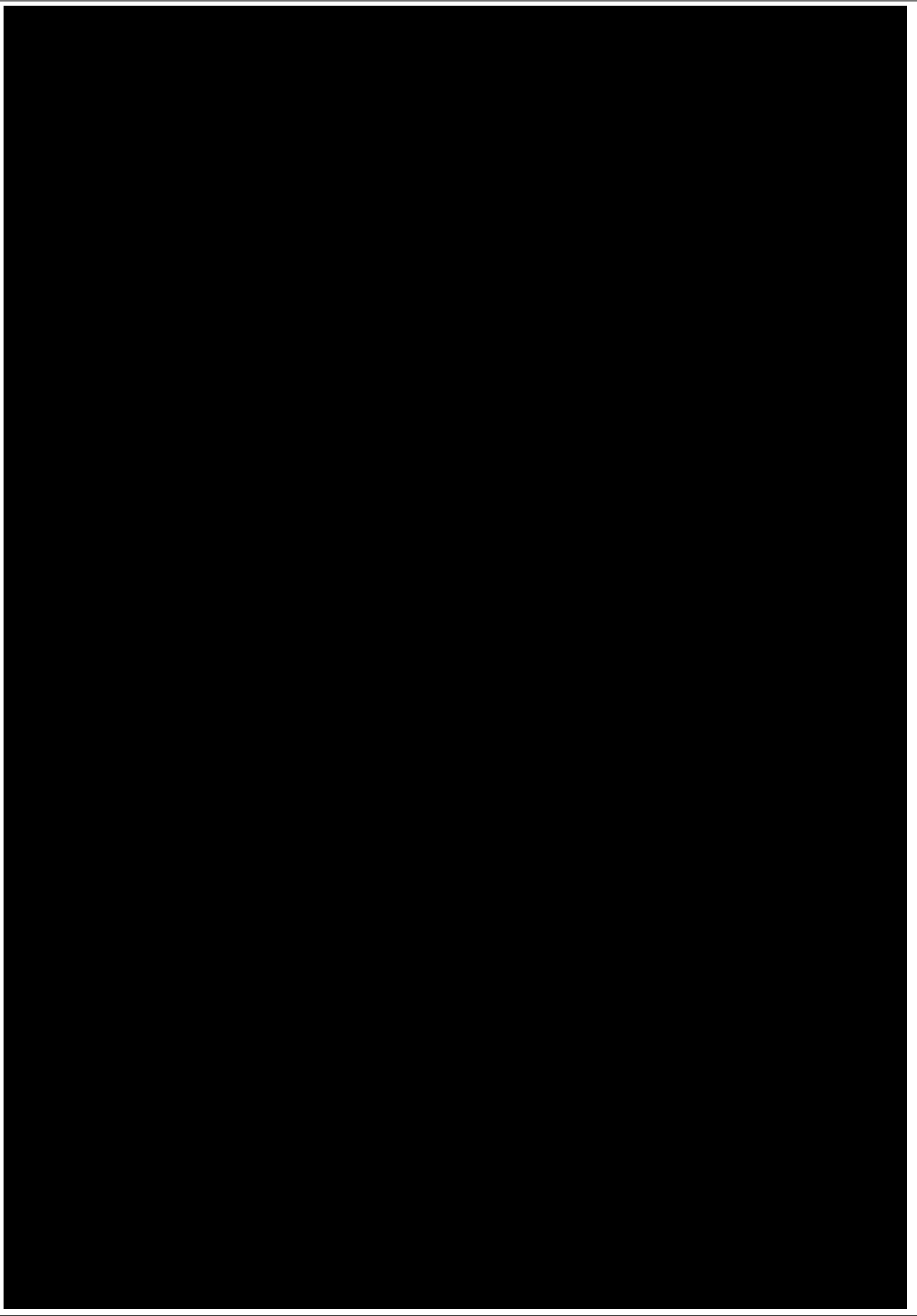
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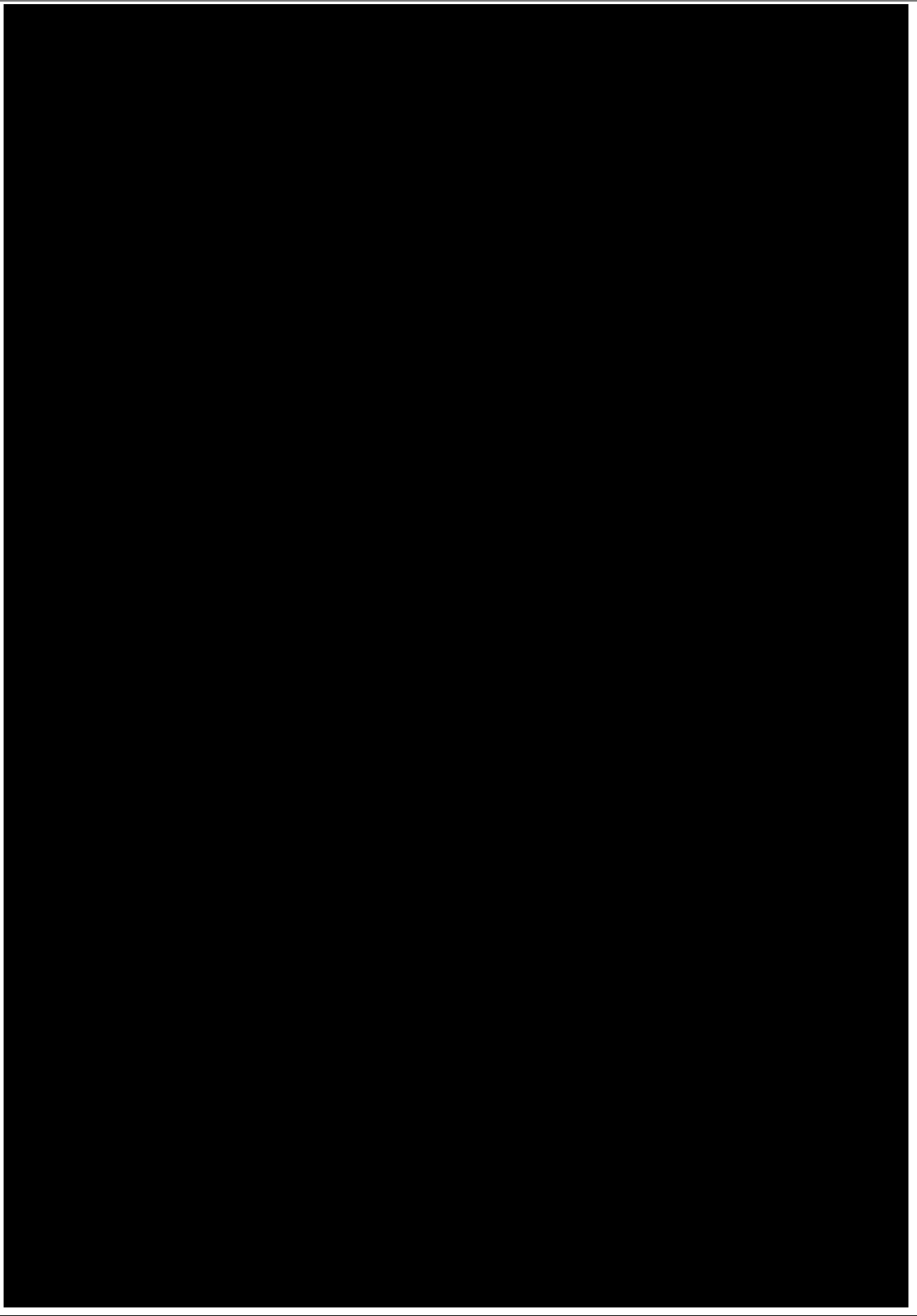
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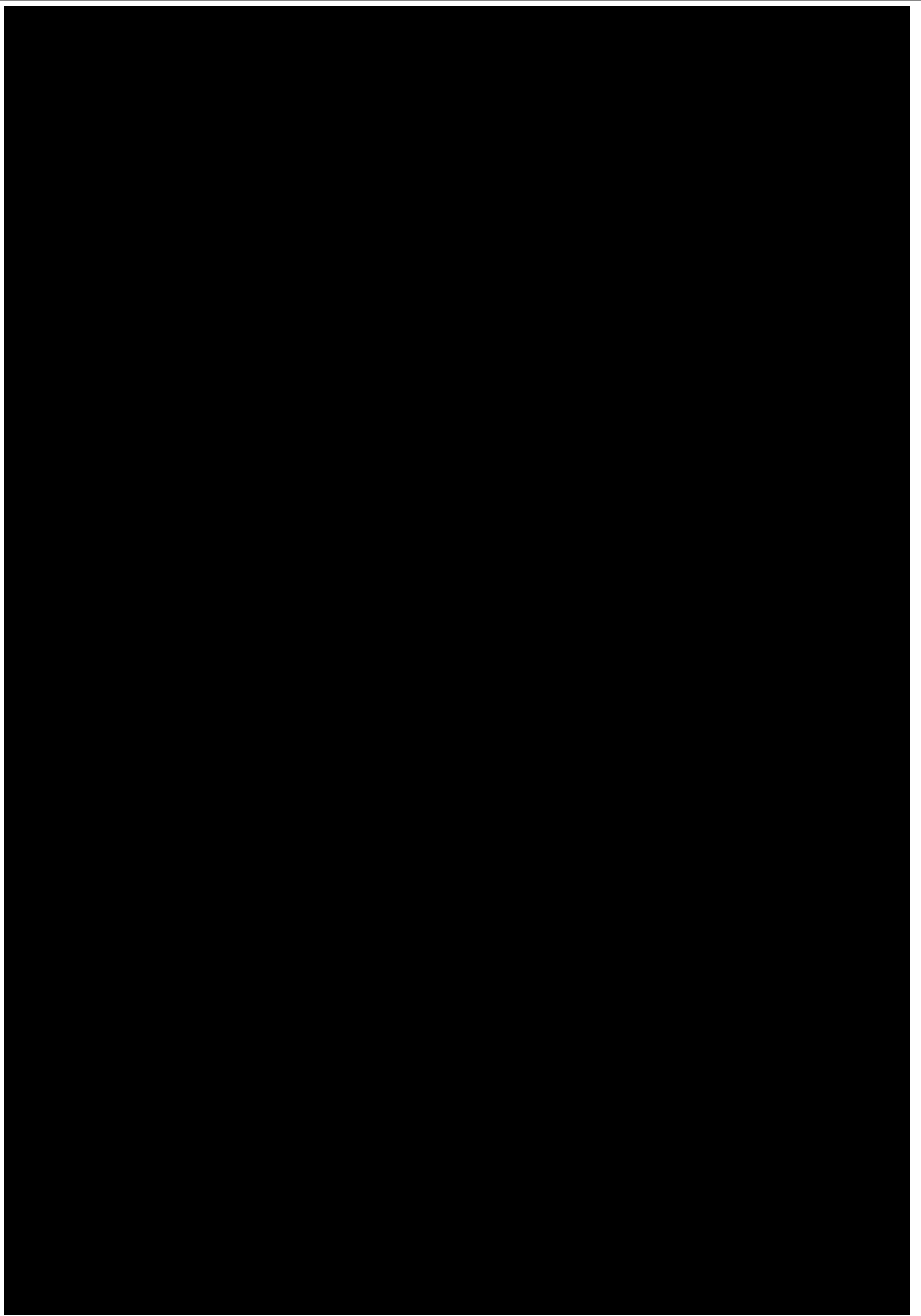
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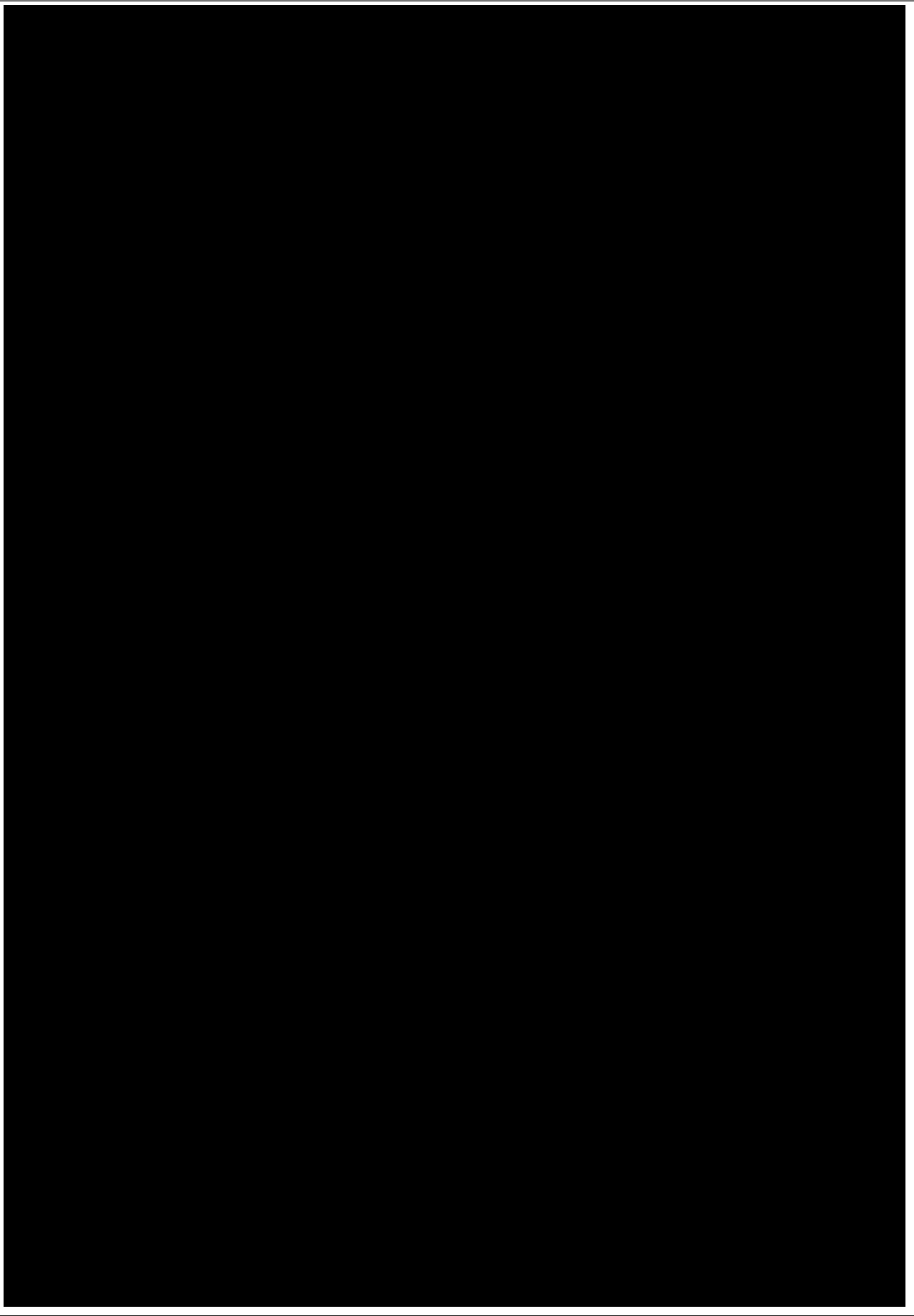
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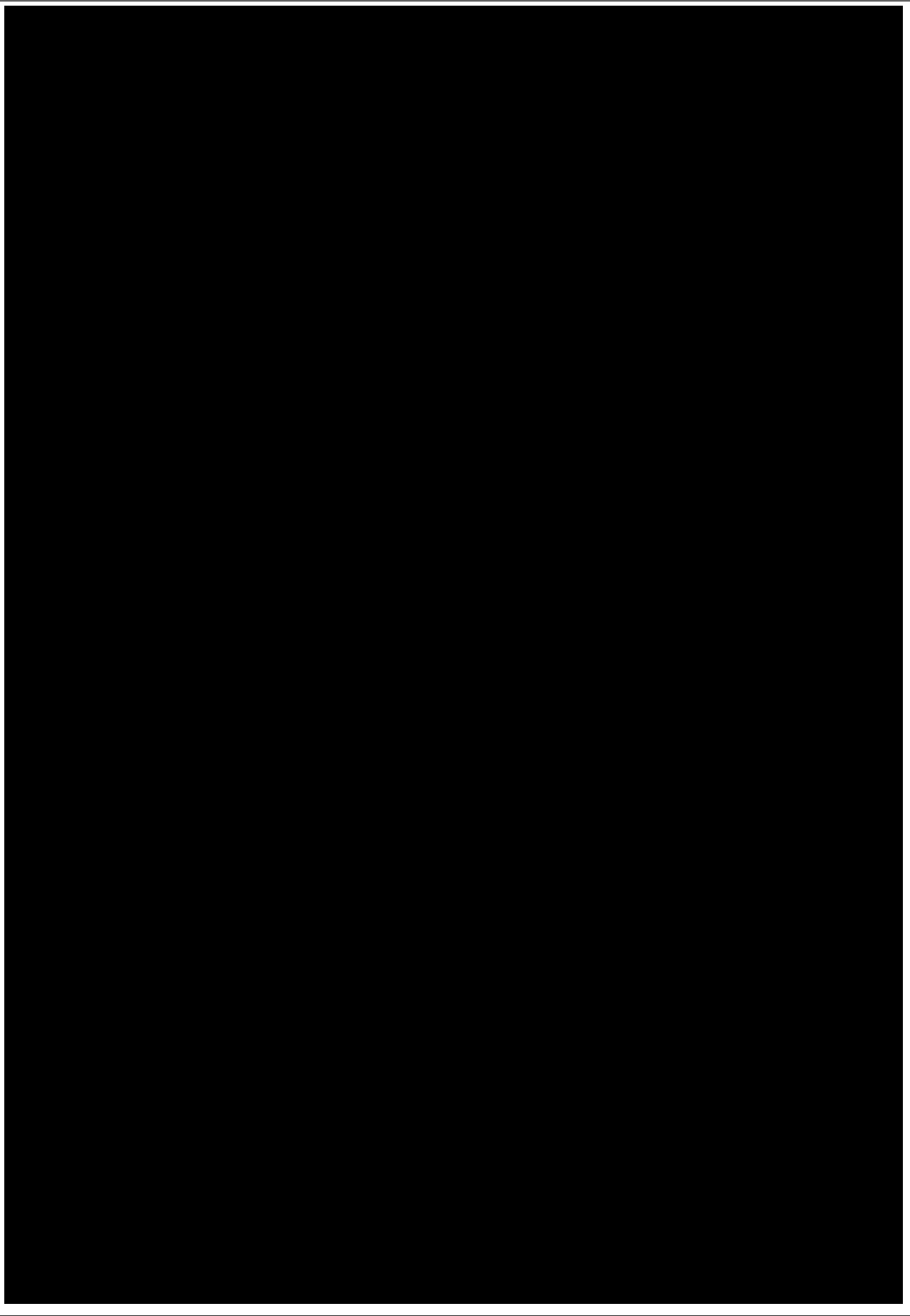
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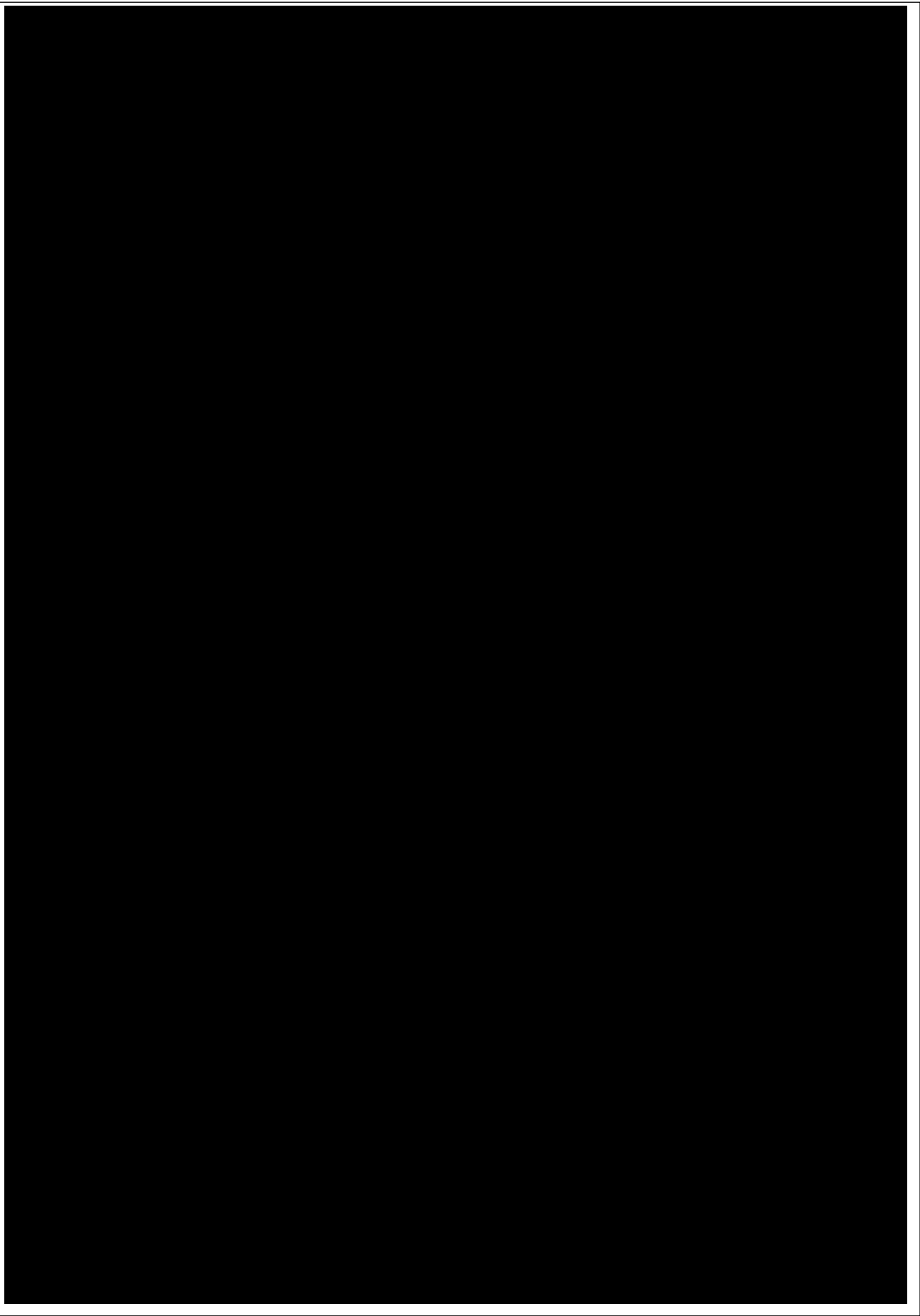
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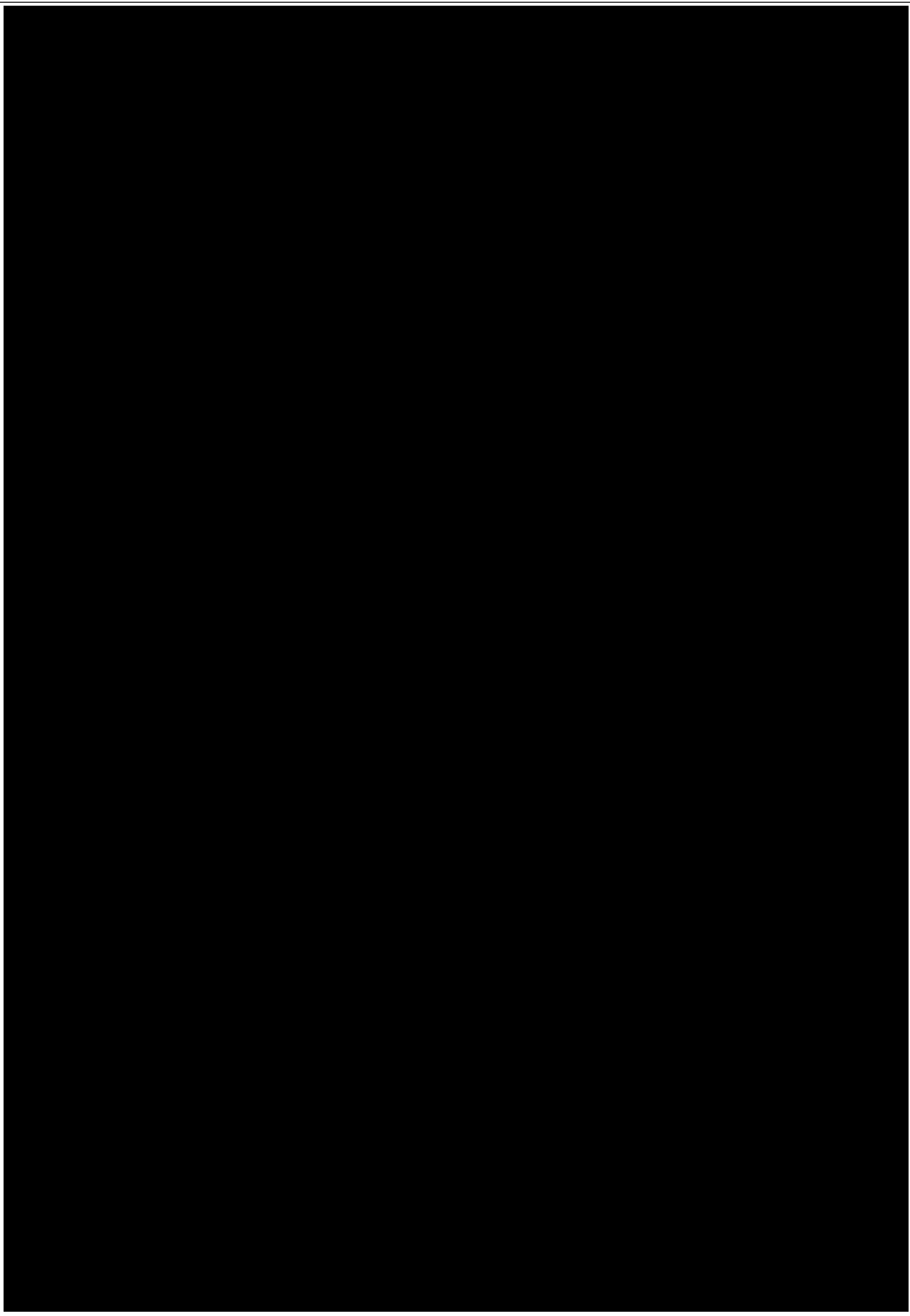
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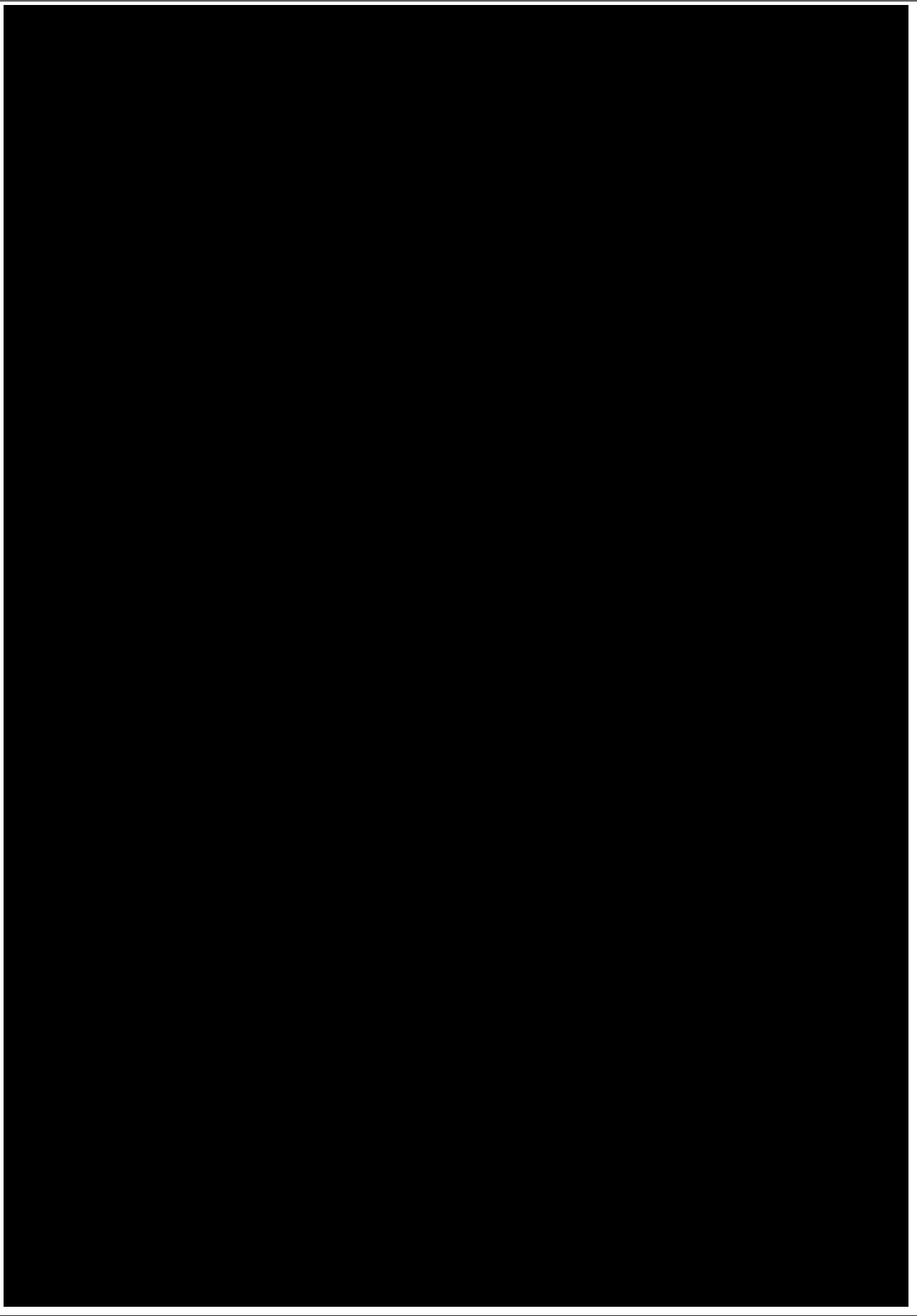


EXHIBIT 4 – REDACTED

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BEFORE JAMS

(JUDICIAL ARBITRATION AND MEDIATION SERVICES)

GOOGLE LLC,

Claimant,

vs. Reference No. 1100086069

ANTHONY LEVANDOWSKI and (consolidated)

LIOR RON,

Respondents.

REPORTER'S TRANSCRIPT OF ARBITRATION PROCEEDINGS

JAMS

2 Embarcadero Center

Suite 1500

San Francisco, California

Thursday, May 3, 2018

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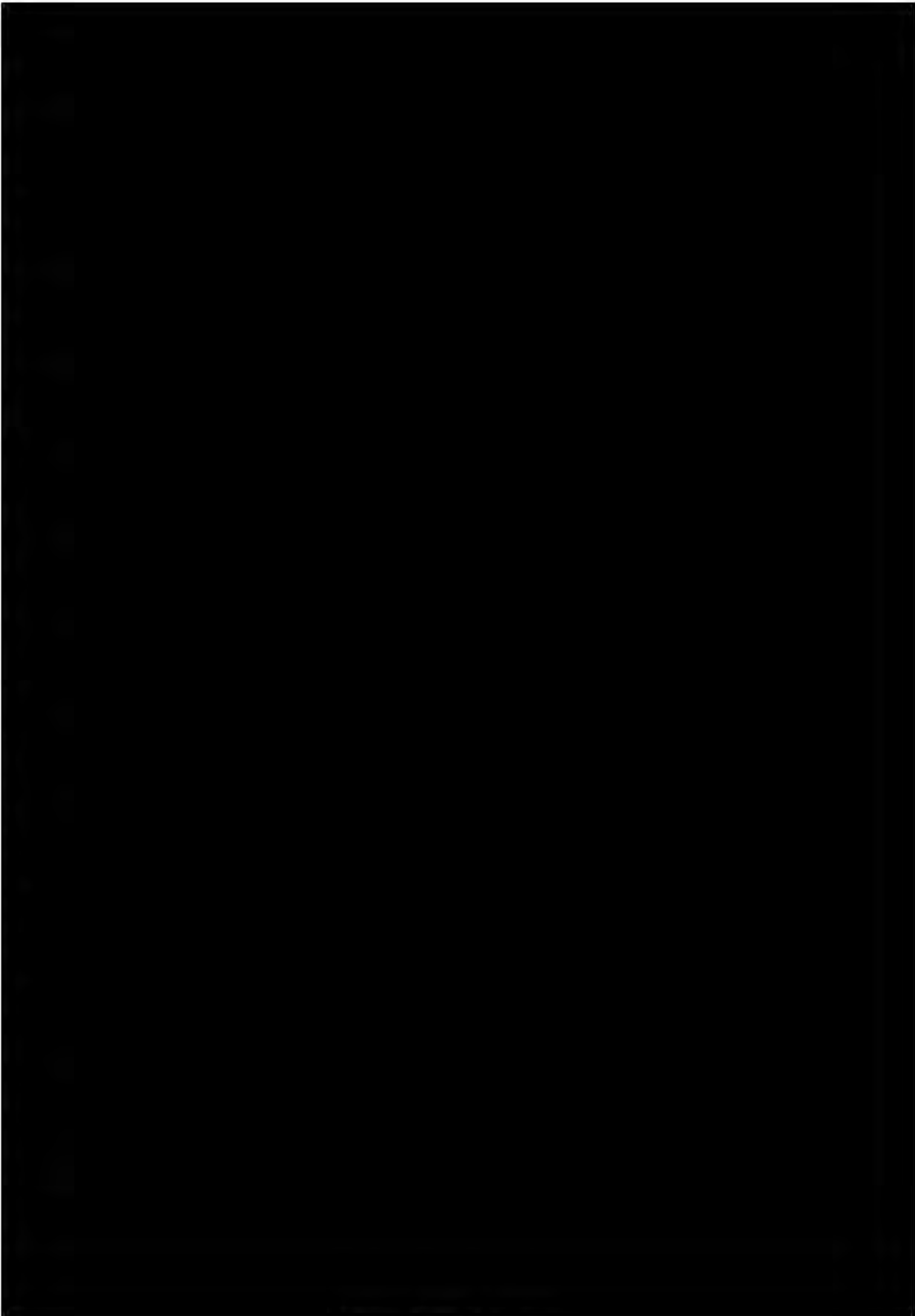
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JOB NO. 2847151

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EXHIBIT 5 – REDACTED

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BEFORE JAMS
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ANTHONY LEVANDOWSKI and
LIOR RON,

Respondents.

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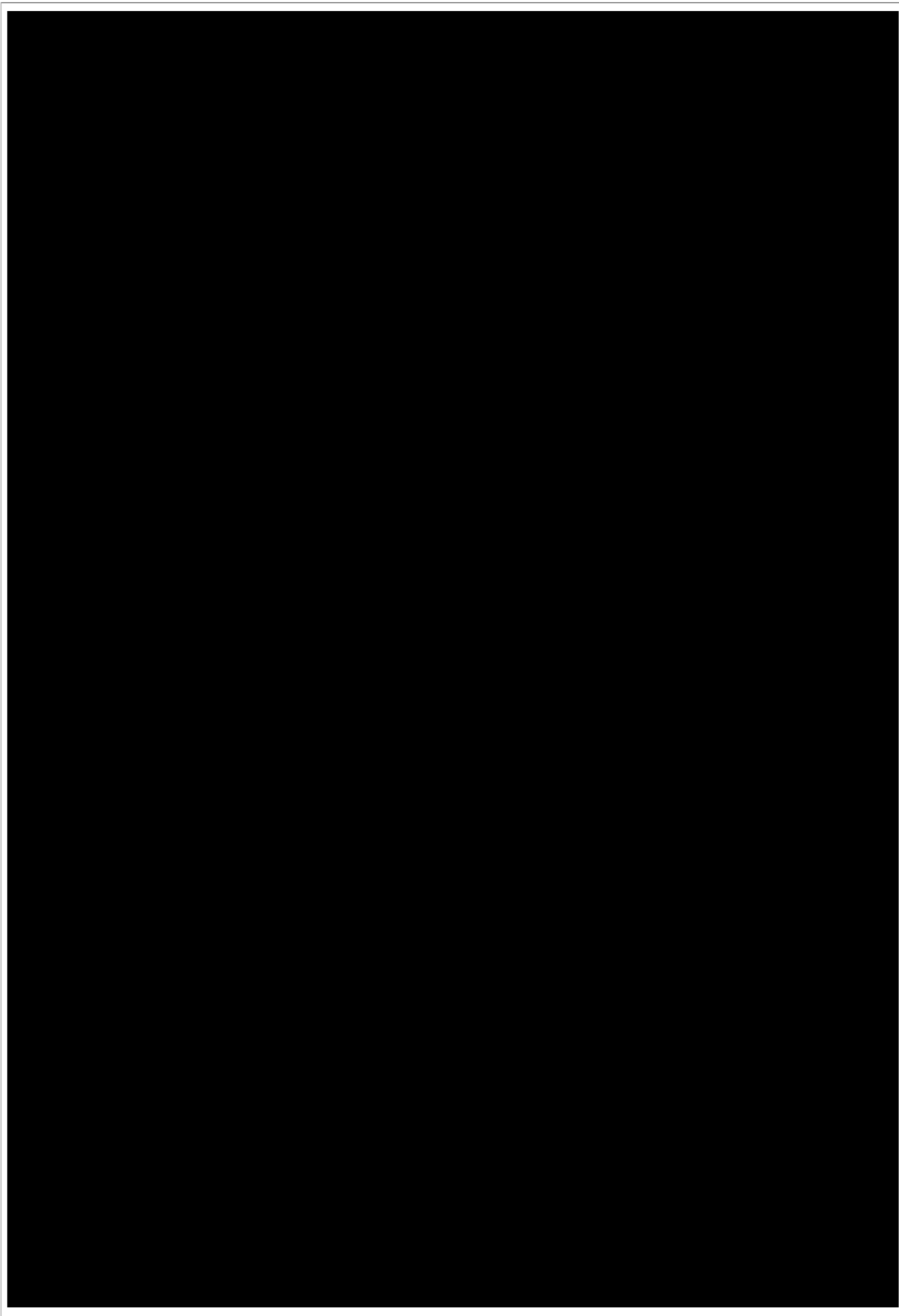
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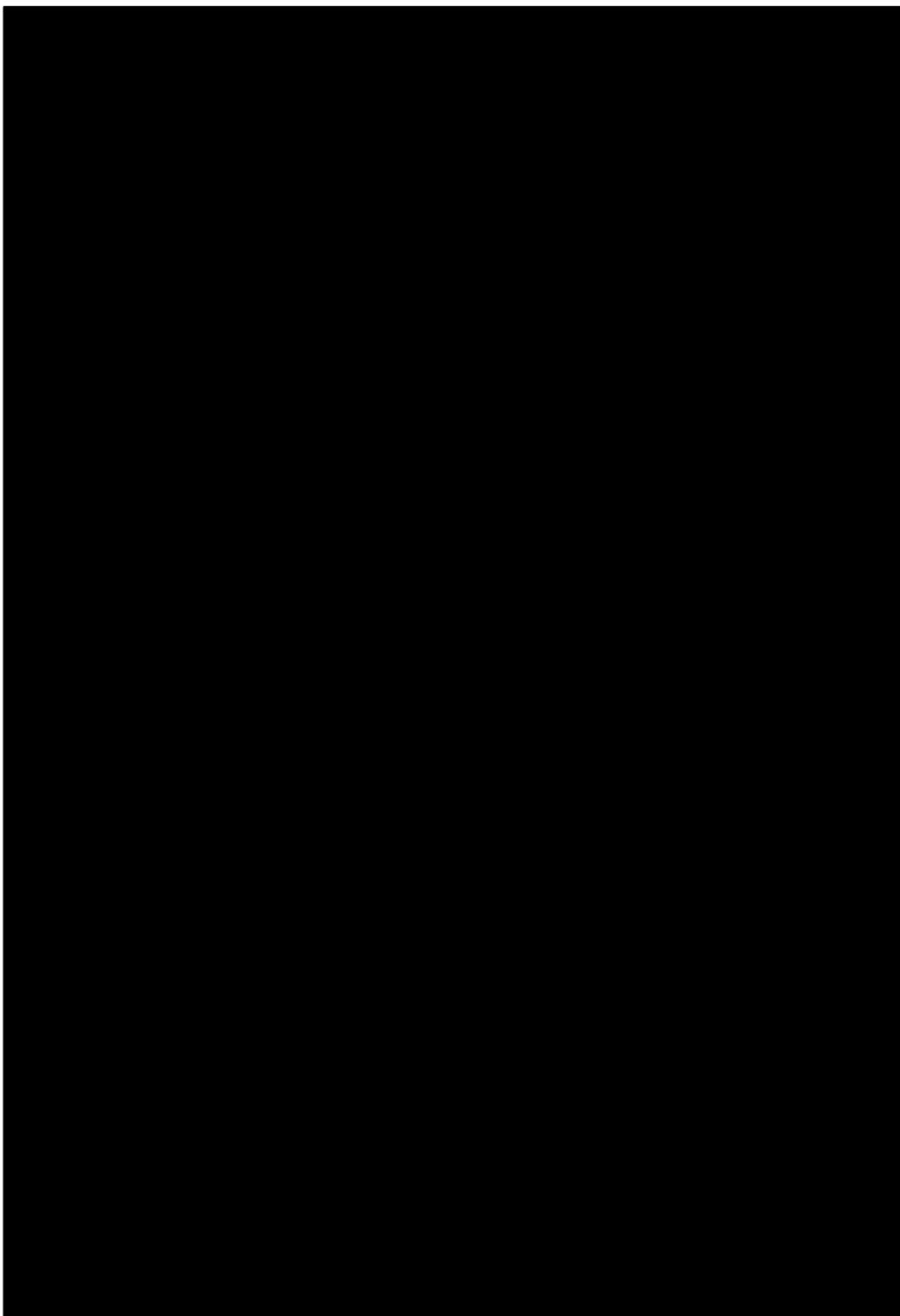
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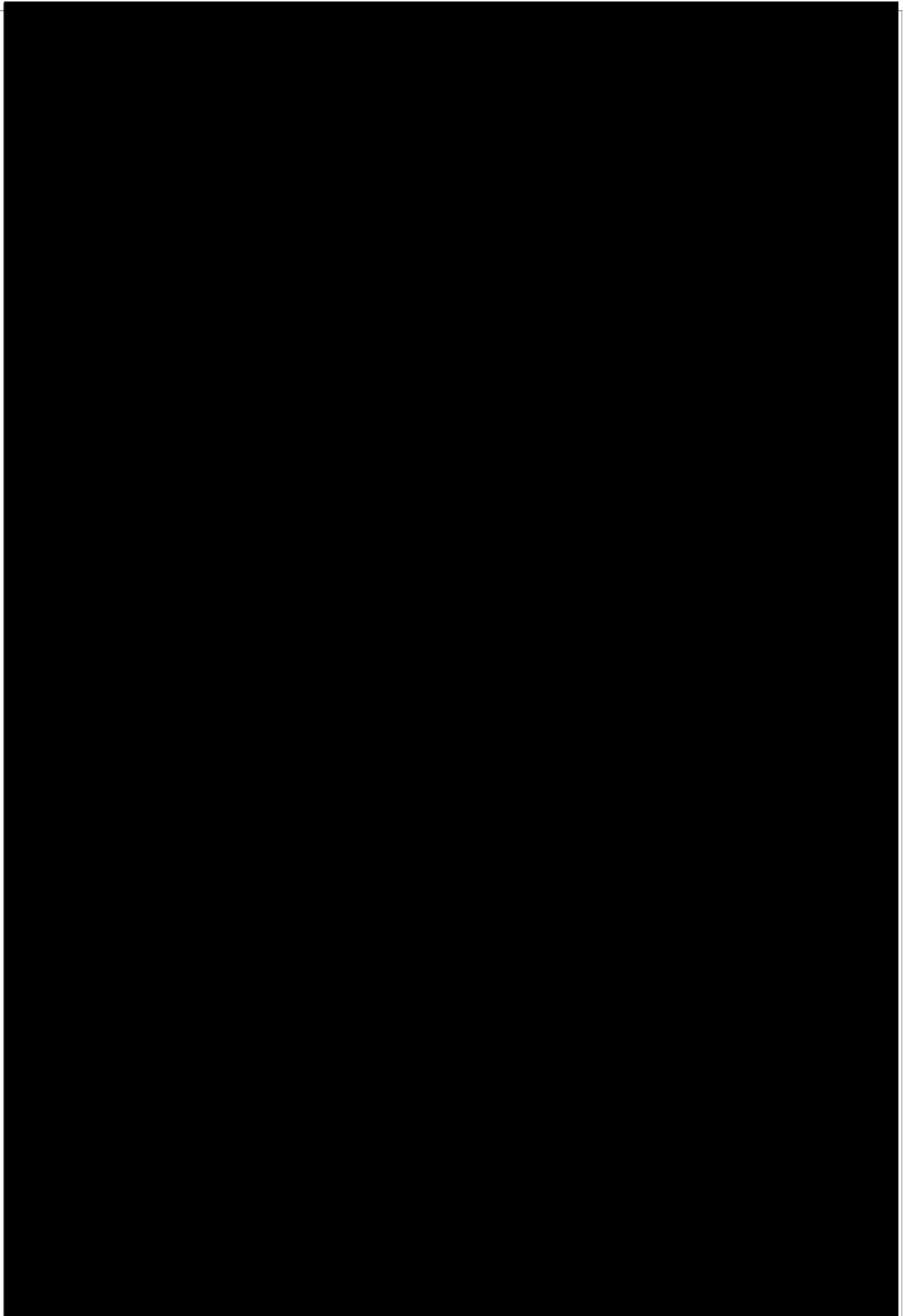
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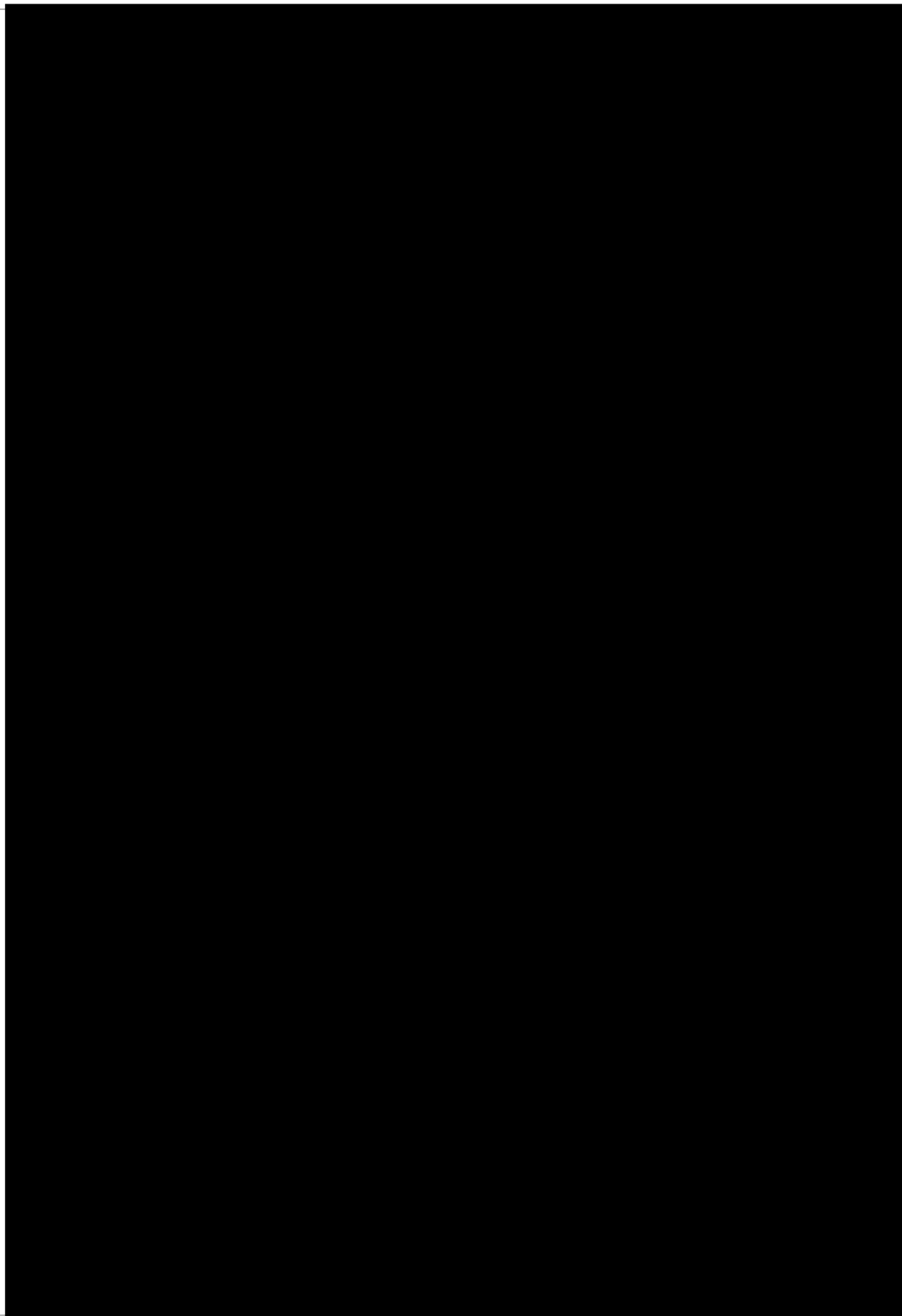
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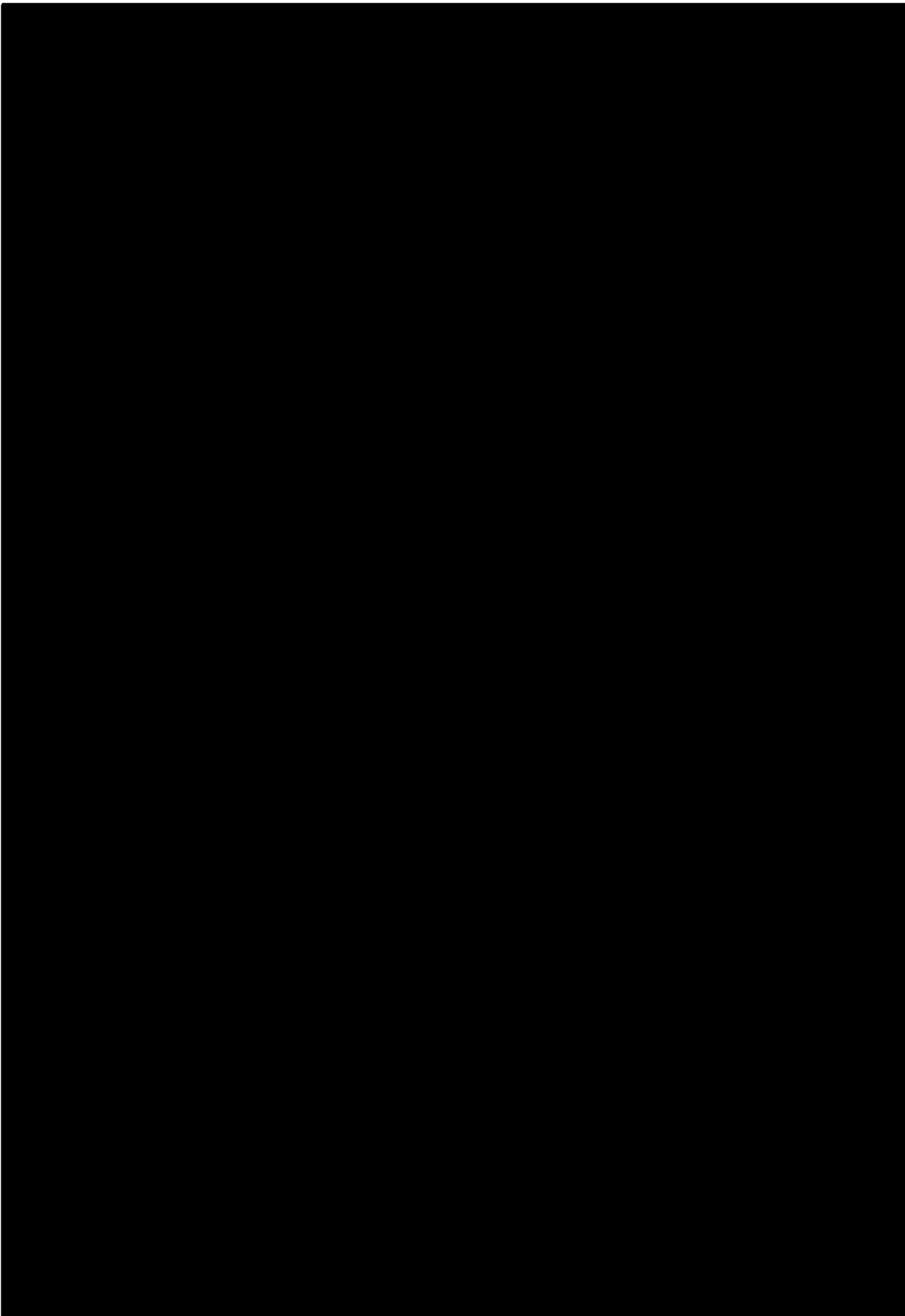
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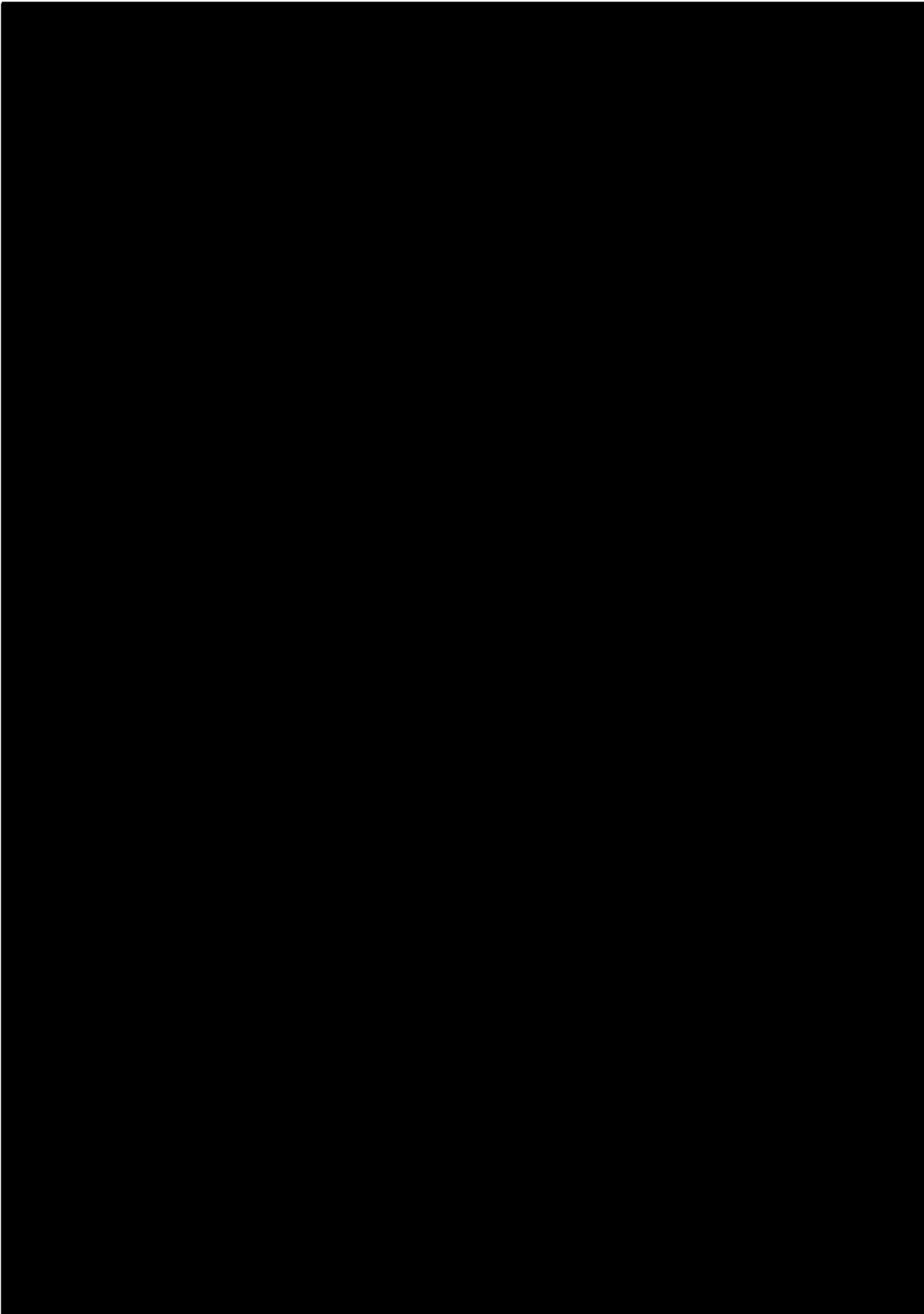
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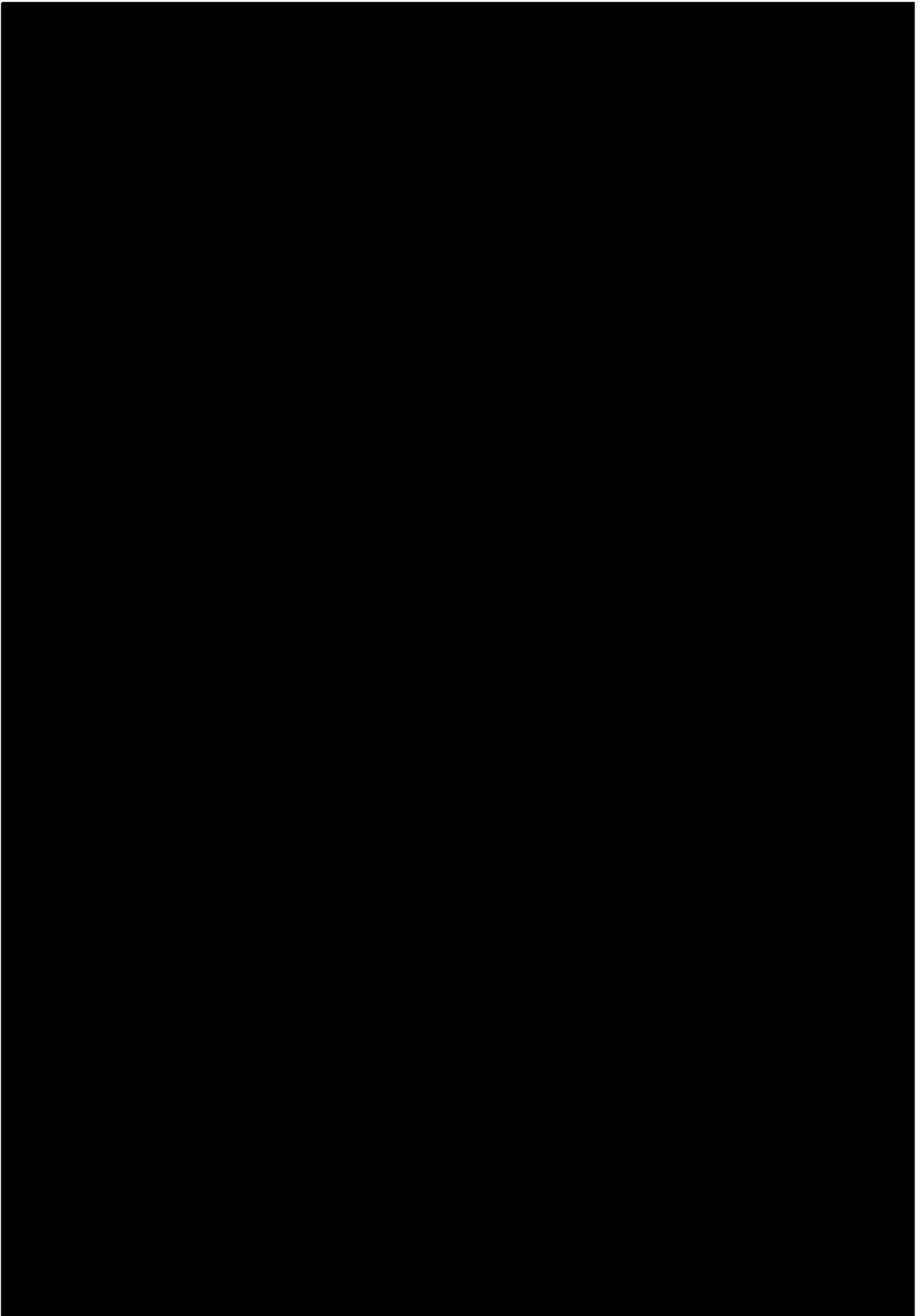
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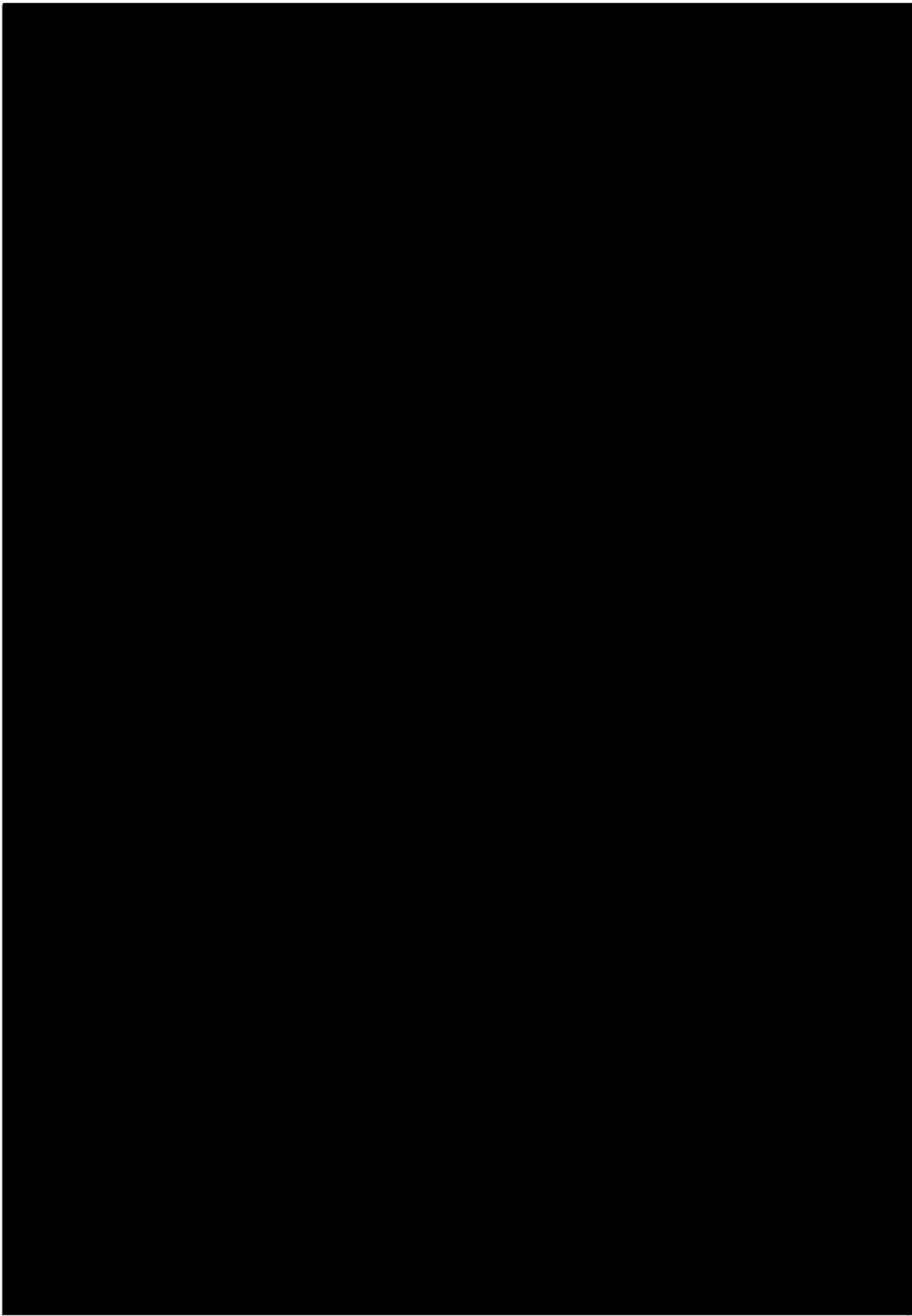
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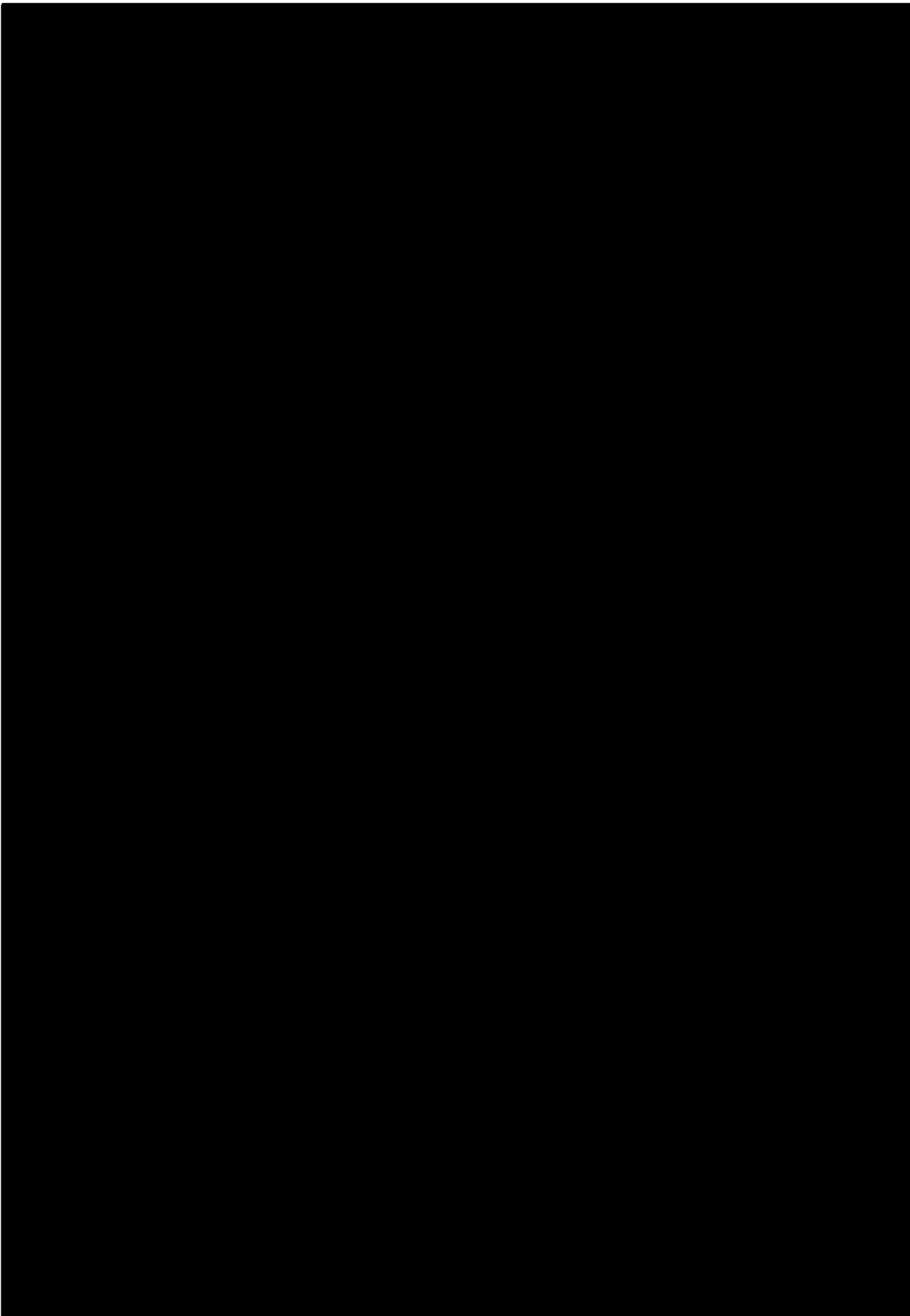
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